

CAUSE NO. DC-19-09828

D&T PARTNERS, LLC
(successor in interest
to ACET VENTURE
PARTNERS, LLC),

Plaintiff,

V.

ACET GLOBAL, LLC;
BAYMARK ACET HOLDCO,
LLC; BAYMARK ACET
DIRECT INVEST, LLC;
BAYMARK MANAGEMENT,
LLC; BAYMARK PARTNERS;
DAVID HOOK; TONY
LUDLOW; and WINDSPEED
TRADING, LLC,

Defendants.

IN THE DISTRICT COURT OF

DALLAS COUNTY, TEXAS

116TH JUDICIAL DISTRICT

REMOTE ORAL DEPOSITION OF

ZHEXIAN "JANE" LIN

MARCH 26, 2021

REMOTE ORAL DEPOSITION of ZHEXIAN "JANE" LIN,
produced as a witness at the instance of the
Defendants, and duly sworn, was taken in the
above-styled and numbered cause on March 26, 2021,
from 9:43 a.m. to 12:57 p.m., before Mendy A.
Schneider, CSR, RPR, in and for the State of Texas,
recorded by machine shorthand, remotely at the offices
of MENDY SCHNEIDER, LLC, The Woodlands, Texas,
pursuant to the Texas Rules of Civil Procedure and the
provisions stated on the record or attached hereto;
that the deposition shall be read and signed.

Page 4

Do you understand that you're here today in connection with a lawsuit between D&T Partners and ACET Global, LLC, Baymark ACET Holdco, LLC, Baymark ACET Direct Invest, LLC, Baymark Management, LLC, Baymark Partners, David Hook, Tony Ludlow and

Page 5

Whenever I ask a question, if you will, just to help keep a clear record, if you'll let me complete before you answer, that will help the court reporter.

Page 6	Page 8
<p>1 This one is timely now: Whenever you 2 give an answer, if you will, give a verbal response 3 and not -- not nodding, because it's hard for them 4 to -- 5 A. Okay. 6 Q. Yeah. 7 If I ask a question you don't understand 8 or it's not clear, please just let me know and I'll 9 clarify it. 10 A. Okay. 11 Q. And would it be fair to say, if -- if you 12 don't tell me you don't understand a question, can I 13 assume you understand it? 14 A. If I don't understand, I will ask. 15 Q. Okay. And then, if you need to take a break 16 at any point -- need to use the restroom or 17 anything -- if you will, just let me know. That's no 18 problem at all. 19 I -- I may just ask that you answer 20 whatever question I've asked before a break. 21 A. Mm-hm. Okay. 22 Q. Did you do anything to prepare for this 23 deposition? 24 A. Not really. 25 Q. And when you say, "Not really," was there</p>	<p>1 A. Just -- just whatever I remembered. 2 Q. So -- so Mr. Szeto told you just to testify 3 about what you remembered? 4 A. Tell the truth. 5 Q. Okay. Did he talk about any specific things 6 that would come up in the deposition? 7 A. No. He just -- he just told me, "Okay, 8 probably they will ask you about any financials," like 9 those. 10 Q. Okay. 11 A. But he didn't bring up to the details. 12 Q. And he didn't say what to say about those? 13 A. No. 14 Q. Nothing? 15 A. Mm-hm. I just tell the truth. 16 Q. Okay. Did you meet with anyone else to 17 prepare for it? 18 A. Actually, we had a conference call and 19 discussed with -- my boss just showed us, like, "Okay, 20 this is" -- "if this is your first time for a 21 deposition, you need to" -- like, some behavior 22 questions like "You have to wait until the lawyer 23 finish the question," like that. 24 He just tell us, "Okay, what do you need 25 to do in a deposition? Just listen carefully and</p>
Page 7	Page 9
<p>1 anything at all or...? 2 A. No, I -- I just tell the truth. 3 Q. Okay. 4 A. Whatever I remember. 5 Q. Okay. Did you discuss the deposition with 6 anyone? 7 A. Actually, my boss told me we're going to have 8 a deposition and, yes, he talked to me, like, 9 "Okay" -- because, this is my first time, so he talked 10 to me about the deposition, yes. 11 Q. Okay. And who is your boss? 12 A. William Szeto. 13 Q. Szeto? Mr. Szeto? 14 A. Yes. 15 Q. What did he tell you specifically about the 16 deposition? 17 A. He just told me, "Okay, just tell the truth, 18 don't tell a story. Don't make up a story, just tell 19 the truth." 20 Q. And what did he mean by, "Don't make up a 21 story"? 22 A. Just -- just tell the truth, whatever really 23 happened before, you know? 24 Q. Okay. Did he tell you anything about 25 remembering or forgetting anything?</p>	<p>1 answer, and tell the truth." 2 Q. Okay. Was there anybody else you discussed 3 it with besides Mr. Szeto? 4 A. My coworkers. 5 MS. HARD-WILSON: Objection -- 6 Q. (BY MR. FREEMAN) Your coworkers? 7 MS. HARD-WILSON: Objection; form. 8 A. Mm-hm. 9 MR. FREEMAN: Could you state the -- 10 A. It was a meeting at the company. 11 MR. FREEMAN: Could you state the basis 12 for that objection? 13 MS. HARD-WILSON: That it might call for 14 attorney-client privileged information. 15 Q. (BY MR. FREEMAN) Jane, one thing I'll be 16 clear of: I don't want you to tell me anything you 17 discussed directly with your lawyer. 18 And so, if you're about to -- if you 19 feel like you're about to start talking about what you 20 might have said with your lawyer at any point, give an 21 opportunity for Ms. Wilson to object or to assert a 22 privilege. 23 MR. FREEMAN: So, just to be clear, that 24 was not an "Objection; form" but an assertion of 25 privilege?</p>

<p style="text-align: right;">Page 10</p> <p>1 MS. HARD-WILSON: Well, depending on 2 the -- the direction the question was going. 3 MR. FREEMAN: Okay. 4 Q. (BY MR. FREEMAN) So, Jane, who -- who else 5 did you talk to? You mentioned some coworkers. 6 THE WITNESS: Should I answer this 7 question? 8 MS. HARD-WILSON: If -- if it relates to 9 conversations with attorneys, then do not answer. 10 THE WITNESS: Do not answer? Okay. 11 Q. (BY MR. FREEMAN) Jane, I think you can answer 12 the question as to who else did you talk with about 13 this; and you can -- you can and are required to tell 14 me if you talked with an attorney. 15 MR. PERRIN: Objection to sidebar and 16 instruction to the witness. 17 THE WITNESS: Who said -- okay. 18 Q. (BY MR. FREEMAN) Jane, who else did you 19 discuss this deposition with? 20 A. I have to ask Brenda, like, if I can answer 21 this -- if I should answer this question or... 22 MS. HARD-WILSON: Yes. You can answer 23 who you spoke with but not what we discussed. 24 THE WITNESS: Okay. 25 A. Yes. We had a meeting, and my boss just gave</p>	<p style="text-align: right;">Page 12</p> <p>1 Q. And what's your current position at 2 Windspeed? 3 A. I work as accountant. 4 Q. How long have you been in that position? 5 A. I started work in this company -- actually, I 6 got hired in March 2018. 7 Q. Okay. And is that when you began working for 8 Windspeed? 9 A. I think it was ACET Global at that time. 10 Q. Okay. Let's stick with your position at 11 Windspeed currently. 12 What are your responsibilities in this 13 position? 14 A. Doing any financials and invoicings, pay 15 bills, payrolls. Mm-hm. Accounting related. 16 Q. Okay. Do you deal with the bank accounts? 17 A. Yes. 18 Q. Do you review those, reconcile those? 19 A. Yes. 20 Q. Okay. And do you prepare the accounting? Do 21 you maintain the accounting records? 22 A. Yes. 23 Q. Do you prepare the financial statements? 24 A. Yes. 25 Q. Who do you provide those to?</p>
<p style="text-align: right;">Page 11</p> <p>1 us some instructions on how we behave in the 2 deposition; so just like a conference call in the 3 company, with -- with the coworkers. 4 Q. (BY MR. FREEMAN) Okay. What coworkers were 5 on that -- 6 A. Dana and Sai, because they will have a 7 deposition, too. 8 Q. Okay. 9 A. We have the same instructions from our boss. 10 Q. Okay. Did you speak with anyone else? 11 A. I just -- I just gave -- I just got 12 instructions from my boss and -- you know. 13 Q. Didn't speak with anyone else about it? 14 A. I think -- I think -- I think I speak to our 15 company lawyer. Our company lawyer Alex. 16 It's Windspeed. I -- he -- he is a 17 Windspeed Trading lawyer, and he gave us same 18 instructions. 19 Q. And I don't need you to tell me what he -- 20 what he said, just whether or not you spoke with him. 21 A. Yes. 22 Q. Okay. Okay. Thank you, Jane. 23 Are you currently an employee of 24 Windspeed Trading, LLC? 25 A. Yes.</p>	<p style="text-align: right;">Page 13</p> <p>1 A. My boss. 2 Q. Mr. Szeto? 3 A. Mm-hm. 4 Q. Anyone else? 5 A. I provide to him. 6 Q. Okay. Do you help with the taxes? 7 A. Yes. 8 Q. And what do you do, helping with the taxes? 9 A. Okay. We pay taxes, make a payment. 10 Q. Okay. Do you help calculate them? 11 A. No. 12 Q. Do you -- do you scan documents? 13 A. Yes. 14 Q. Is there a particular scanner that you use? 15 A. I used to use the one in our office. 16 Q. Which one is that? 17 A. The printer in the office. 18 MR. PERRIN: Objection; form. 19 Q. (BY MR. FREEMAN) I'm sorry? 20 A. The printer in my office. 21 Q. The printer in your office? 22 A. Mm-hm. 23 Q. Is that the Toshiba printer-scanner? 24 A. We used to have that one. 25 Q. When did you stop having that one?</p>

Page 14

1 A. I don't remember a specific date.
2 Q. What's a ballpark date? Are you talking --
3 are you talking about a year ago that you stopped
4 having it?
5 MS. HARD-WILSON: Objection; form.
6 A. Actually, I really do not remember. At least
7 one year ago.
8 Q. (BY MR. FREEMAN) That you got rid of it?
9 MR. PERRIN: Objection; form.
10 MR. FREEMAN: Can you state the basis
11 for your objection, Mr. Perrin?
12 MR. PERRIN: Yeah. Lack of foundation,
13 mischaracterizes testimony.
14 MR. FREEMAN: It's not a proper
15 objection.
16 MR. PERRIN: Yeah, it is.
17 MR. FREEMAN: So let's please -- let's
18 please stop trying to coach the witness.
19 MR. PERRIN: I'll make my objections.
20 And I made them on the record. You
21 asked for the explanation. I gave it to you.
22 MR. FREEMAN: Correct. And I'm entitled
23 to ask for it, but that's not a proper objection.
24 A. Okay. May I ask? "Objection; form" means
25 should I answer, right? Or I shouldn't? Should I not

Page 15

1 answer "Objection; form"?
2 Q. (BY MR. FREEMAN) You can still answer.
3 A. Okay.
4 Q. Jane, why did you get -- why did the company
5 get rid of the scanner?
6 MR. PERRIN: Objection; form.
7 MS. HARD-WILSON: Objection; form.
8 A. It was broken.
9 THE WITNESS: Did you say "Objection;
10 form"?
11 MS. HARD-WILSON: Yes.
12 A. That one was broken.
13 Q. (BY MR. FREEMAN) How was it broken?
14 A. Just -- just -- just doesn't -- just didn't
15 work.
16 Q. Okay. Who made the decision to get rid of
17 it?
18 A. I -- I called my boss.
19 Q. So you made the decision to get rid of the
20 scanner?
21 A. No. My boss.
22 MS. HARD-WILSON: Objection; form.
23 Q. (BY MR. FREEMAN) Jane, will you tell me,
24 did -- did the company have a Toshiba scanner
25 previously?

Page 16

1 A. It was not a scanner; it -- it was a printer.
2 It was -- you can -- you still can use that for
3 scanning.
4 Q. So the Toshiba printer, did it allow for
5 scanning?
6 A. Right.
7 Q. Okay. And did the company make a decision to
8 get rid of that printer that scanned?
9 MS. HARD-WILSON: Objection; form.
10 A. Yes.
11 Q. (BY MR. FREEMAN) Was that decision made by
12 you?
13 A. No.
14 MS. HARD-WILSON: Objection; form.
15 MR. FREEMAN: Can you state the basis
16 for your objection?
17 MS. HARD-WILSON: Asked and answered.
18 You already asked that question.
19 MR. FREEMAN: These are not proper
20 objections for a deposition. Let's please stop trying
21 to coach the witness.
22 MR. PERRIN: Jason, those are very
23 proper, and you -- they -- those are bases for the
24 form objection under the Texas Rules. Read them.
25 That's correct.

Page 17

1 And -- and you can go ahead and say it
2 all you want to, but we're going to make the proper
3 objections in form; and if you ask us, we'll tell you
4 what it was.
5 Q. (BY MR. FREEMAN) Jane, who made the decision
6 to get rid of the Toshiba printer?
7 MS. HARD-WILSON: Objection; form.
8 A. My boss.
9 Q. (BY MR. FREEMAN) And who was your boss?
10 A. William Szeto.
11 Q. Who do you report to in your -- your current
12 position?
13 A. My boss.
14 Q. Mr. Szeto?
15 A. Yes.
16 Q. Is there anyone else?
17 THE WITNESS: Should I answer?
18 MS. HARD-WILSON: Yes.
19 A. No, just my boss.
20 Q. (BY MR. FREEMAN) Jane, who signs your
21 paycheck?
22 A. My boss.
23 Q. Mr. Szeto?
24 A. Yes.
25 Q. Is it fair that when you -- for me to

Page 18	Page 20
<p>1 understand, whenever you refer to "my boss," you're</p> <p>2 referring to Mr. Szeto every time?</p> <p>3 A. Yes. Mr. Szeto is my boss.</p> <p>4 Q. Who is the owner of Windspeed?</p> <p>5 A. William Szeto.</p> <p>6 Q. How long has he been the owner of Windspeed?</p> <p>7 A. Since it was established.</p> <p>8 Q. Are there any owners of -- other owners of</p> <p>9 Windspeed?</p> <p>10 A. No.</p> <p>11 Q. Have you had any other positions with</p> <p>12 Windspeed?</p> <p>13 A. Can you say that again, please?</p> <p>14 Q. Have you had any other positions with</p> <p>15 Windspeed?</p> <p>16 A. I am only doing accounting here.</p> <p>17 Q. Okay. Who else has worked at Windspeed?</p> <p>18 A. Who -- can -- so you're asking me who else?</p> <p>19 Q. Yes, ma'am.</p> <p>20 A. Is my coworker?</p> <p>21 Q. Yes.</p> <p>22 A. Sai Montana [phonetic], Dana and Paula. And</p> <p>23 there was an employee called Vanessa, but he -- but</p> <p>24 she just left.</p> <p>25 Q. Vanessa just left.</p>	<p>1 Q. Baymark Partners?</p> <p>2 A. No.</p> <p>3 Q. ACET Global?</p> <p>4 A. Yes.</p> <p>5 Q. Are you currently an employee of ACET Global?</p> <p>6 A. Currently, no.</p> <p>7 Q. When did you start working for ACET Global?</p> <p>8 A. March 2018.</p> <p>9 Q. And when did you stop working for ACET</p> <p>10 Global?</p> <p>11 A. I think, September 2018.</p> <p>12 Q. Okay. And, Jane, do you have any notes there</p> <p>13 with you?</p> <p>14 A. No. I don't have any notes, no.</p> <p>15 Q. And what was that piece of paper you just</p> <p>16 moved?</p> <p>17 A. Just -- I don't look at those, just notes on</p> <p>18 behavioral questions.</p> <p>19 Q. Some what?</p> <p>20 A. I -- no, I don't look at those, any</p> <p>21 documents. Nothing here.</p> <p>22 Q. Okay. Can you show us the piece of paper you</p> <p>23 just moved? You just picked up a piece of paper.</p> <p>24 A. Was some trash papers, just drawings,</p> <p>25 because -- because I thought I'm going to probably</p>
Page 19	Page 21
<p>1 Anybody else?</p> <p>2 A. For Windspeed?</p> <p>3 Q. Yes, ma'am.</p> <p>4 A. No.</p> <p>5 Q. Okay. Who were the managers at Windspeed?</p> <p>6 A. Wind -- no, we don't -- I don't know.</p> <p>7 Q. Don't have any other managers?</p> <p>8 A. No.</p> <p>9 Q. Okay. Have you held any positions with any</p> <p>10 of the following entities?</p> <p>11 ACET Venture Partners?</p> <p>12 A. No.</p> <p>13 Q. D&T --</p> <p>14 A. So you're asking me, have I ever worked for</p> <p>15 them?</p> <p>16 Q. Yes, ma'am.</p> <p>17 A. No.</p> <p>18 Q. D&T Partners?</p> <p>19 A. No.</p> <p>20 Q. Baymark ACET Holdco?</p> <p>21 A. No.</p> <p>22 Q. Baymark ACET Direct Invest?</p> <p>23 A. No.</p> <p>24 Q. Baymark Management?</p> <p>25 A. No.</p>	<p>1 make notes. I just put in front of me.</p> <p>2 Q. Thank you, Jane.</p> <p>3 What was your position at ACET Global?</p> <p>4 A. Accounting.</p> <p>5 Q. What did you do in that position?</p> <p>6 A. Invoicings, pay bills and payrolls and</p> <p>7 financials.</p> <p>8 Q. Okay. Was it similar to what you do at</p> <p>9 Windspeed?</p> <p>10 A. Yes.</p> <p>11 Q. Same -- same responsibilities and activities?</p> <p>12 A. Yes.</p> <p>13 Q. Is that the only position you held while at</p> <p>14 ACET Global?</p> <p>15 A. Yes.</p> <p>16 Q. Who did you report to in that position?</p> <p>17 A. William Szeto.</p> <p>18 Q. Mr. Szeto was your boss?</p> <p>19 A. Yes.</p> <p>20 Q. At all times that --</p> <p>21 A. Yes.</p> <p>22 Q. -- you worked for ACET?</p> <p>23 A. Yes.</p> <p>24 Q. Who was the owner of ACET Global?</p> <p>25 A. Owner? I do -- I do not know.</p>

Page 22	Page 24
<p>1 Q. Okay. Was it Mr. Szeto?</p> <p>2 A. I do not know.</p> <p>3 Q. What was your work history and background</p> <p>4 prior to ACET Global?</p> <p>5 A. I -- okay. I worked for a real estate</p> <p>6 company and I worked as an accountant as well.</p> <p>7 Q. Did you have an educational background in</p> <p>8 accounting?</p> <p>9 A. Yes.</p> <p>10 Q. What happened to ACET Global?</p> <p>11 MR. PERRIN: Objection; form.</p> <p>12 MS. HARD-WILSON: Objection; form.</p> <p>13 A. What -- what do you mean by, "What happened"?</p> <p>14 Q. (BY MR. FREEMAN) Why did you stop working</p> <p>15 there?</p> <p>16 A. It was -- the company was closed.</p> <p>17 Q. Why was it closed?</p> <p>18 MS. HARD-WILSON: Objection; form.</p> <p>19 A. I do not know.</p> <p>20 Q. (BY MR. FREEMAN) Did anyone tell you why it</p> <p>21 was closed?</p> <p>22 A. It was September. But I do not know the</p> <p>23 reason.</p> <p>24 Q. September when?</p> <p>25 A. September when? I think I -- I have to</p>	<p>1 A. Days off? I really do not remember when,</p> <p>2 what exact day, ACET Global was closed.</p> <p>3 I think Windspeed was established end of</p> <p>4 September as well, so I cannot recall if there were</p> <p>5 some days between.</p> <p>6 Q. Did you start going to a new place of work?</p> <p>7 A. I do not remember exact date, but, yes. We</p> <p>8 moved out -- we moved to a new building --</p> <p>9 Q. You moved to --</p> <p>10 A. -- for Windspeed.</p> <p>11 Q. -- a new building?</p> <p>12 A. Yes.</p> <p>13 Q. (BY MR. FREEMAN) Did you get a new computer?</p> <p>14 A. No, I -- a new computer? Yes, I got a new</p> <p>15 computer, but I do not remember when.</p> <p>16 But -- but my boss bought me a new</p> <p>17 computer, yes.</p> <p>18 Q. Did -- when you switched from ACET Global to</p> <p>19 Windspeed, did you ever continue using your same</p> <p>20 computer?</p> <p>21 A. I really -- I really do not remember when my</p> <p>22 boss gave me this new computer, but I really got a new</p> <p>23 computer. He bought me this one from Costco.</p> <p>24 Q. Okay. But you don't know when?</p> <p>25 A. I do not remember which month.</p>
Page 23	Page 25
<p>1 check, but -- I have to check. Some -- sometime in</p> <p>2 September, I remember.</p> <p>3 Q. Okay. You sure it wasn't October?</p> <p>4 A. I think, September.</p> <p>5 MS. HARD-WILSON: Objection; form.</p> <p>6 A. I think -- I think it was September.</p> <p>7 Q. (BY MR. FREEMAN) Okay.</p> <p>8 A. End of September, something.</p> <p>9 Q. Okay. And no one told you why it was closed?</p> <p>10 A. No.</p> <p>11 Q. Were you told in advance of it closing?</p> <p>12 A. I'm sorry?</p> <p>13 Q. Did anyone give you a heads up that it was</p> <p>14 going to be closing?</p> <p>15 A. No.</p> <p>16 Q. Just found out one day that it was closing?</p> <p>17 A. I -- actually, I do -- I do not remember.</p> <p>18 But I really -- I just don't remember.</p> <p>19 Q. Okay. And who told you it was closing?</p> <p>20 A. No, I really do not remember, but it was just</p> <p>21 closed.</p> <p>22 And they founded Windspeed and I got</p> <p>23 rehired.</p> <p>24 Q. Okay. Did you have any days off between</p> <p>25 that?</p>	<p>1 Q. Did you start using a new e-mail address?</p> <p>2 A. Yes.</p> <p>3 Q. And you didn't use the old e-mail address any</p> <p>4 after that?</p> <p>5 A. No.</p> <p>6 Q. Okay. Your desk, was it different? Did he</p> <p>7 get you a new desk as well?</p> <p>8 A. Desk? I used old one.</p> <p>9 Q. You used the old -- so you used the same desk</p> <p>10 at Windspeed that you had used at ACET Global?</p> <p>11 A. Yes.</p> <p>12 Q. Okay. What else did you use that was the</p> <p>13 same?</p> <p>14 A. Cabinet.</p> <p>15 Q. Okay. What else?</p> <p>16 A. No.</p> <p>17 Q. "No"? I'm sorry.</p> <p>18 A. Can -- can you give me example? I don't</p> <p>19 know.</p> <p>20 I think, just desk and cabinet.</p> <p>21 Q. Okay. What about your phone?</p> <p>22 A. That's my personal phone.</p> <p>23 Q. You didn't have a phone in your office?</p> <p>24 A. Not for Windspeed, no.</p> <p>25 Q. So only your computer.</p>

Page 26

1 That -- that's your sworn testimony,
2 only your computer and your desk were the same?
3 A. I do not remember the computer. The desk and
4 cabinet were the same.
5 Q. I'm going to ask you about a few people.
6 I -- I'd like to ask you some -- some questions on
7 them.
8 First, Tomer Damti. Who is Tomer Damti?
9 A. I never met him.
10 Q. Do you know anything about his -- what his
11 role was?
12 A. He was the boss of ACET Global.
13 Q. Did you have -- ever have any meetings
14 discussing him?
15 A. No. I never -- I never met him.
16 Q. Did you ever discuss him with your boss?
17 A. No.
18 Q. Never?
19 A. No. Because, when I started to work for ACET
20 Global, he left.
21 Q. Okay.
22 A. Mm-hm. He left already.
23 Q. So it's your testimony you never discussed
24 Mr. Damti with anyone at -- at Windspeed?
25 A. They mentioned he was the boss for ACET

Page 27

1 Global.
2 Q. What else did they say about him?
3 A. He left.
4 Q. Did they say why?
5 A. No.
6 Q. I'm going to ask you about Mr. Szeto.
7 When did -- when did you first meet
8 Mr. Szeto?
9 A. March 2018.
10 Q. And he's the boss of Windspeed; is that
11 correct?
12 A. Windspeed? You're asking Windspeed Trading,
13 right? Yes.
14 Q. Yes, ma'am.
15 A. He's the CEO of Windspeed.
16 Q. Okay. Have you talked to him about what his
17 role was at ACET Global?
18 MS. HARD-WILSON: Objection; form.
19 A. He was my boss when I worked for ACET Global.
20 Q. (BY MR. FREEMAN) Okay. And my question is
21 specifically, have you talked with him in the last --
22 in recent -- in the last month --
23 A. No.
24 Q. -- about what his role at ACET was?
25 A. No.

Page 28

1 Q. Okay. What was his -- what was his role at
2 ACET Global?
3 MS. HARD-WILSON: Objection; form.
4 A. He was my boss. Like, I reported to him.
5 Q. (BY MR. FREEMAN) Is it the same position that
6 he has now for Windspeed?
7 A. Okay. I do not know "the same position"
8 mean; but, for me, I reported to him. He is my boss.
9 Q. Did everyone report to him?
10 A. Like, Sai's report, a sales report, to him.
11 I reported accounting-related forms to
12 him.
13 Q. Okay.
14 A. Everybody reported to him, yes.
15 Q. Was he the highest-level person at ACET
16 Global?
17 MS. HARD-WILSON: Objection; form.
18 A. Well, ACET Global, I do not know; but, for
19 Windspeed, yes.
20 Q. (BY MR. FREEMAN) Okay. I want to ask you
21 about an individual named Matt Denegre.
22 Do -- do you know who Matt a Denegre is?
23 A. Yes, I know him.
24 Q. Who is he?
25 A. He is an employee from Baymark.

Page 29

1 Q. Is he an employee of Windspeed?
2 A. No.
3 Q. He works for Baymark?
4 A. I think so --
5 MR. PERRIN: Objection; form.
6 A. -- yeah.
7 Q. (BY MR. FREEMAN) Do you know specifically who
8 he works for?
9 A. No. I -- no. But I met him in my office.
10 Q. Okay. Was he at your office very often?
11 A. No.
12 Q. Okay. What did he do at your office?
13 A. I do not remember. But he just came and said
14 hi, and I met -- I met him.
15 He -- he came to my office and talked to
16 us.
17 Q. What did he talk to you about?
18 A. Just say hi; not...
19 Q. Did he talk to you about accounting?
20 A. No.
21 Q. Did he talk to you about reports?
22 A. No.
23 Q. Did he talk to you about how the company was
24 doing?
25 A. No.

Page 30	Page 32
<p>1 Q. Did he ever attend any company meetings?</p> <p>2 A. No. Our company meetings, no.</p> <p>3 Q. Okay. Were there other company meetings he</p> <p>4 attended?</p> <p>5 A. What do you mean by "other company meetings"?</p> <p>6 Q. Well, I wasn't sure what you meant by "our</p> <p>7 company meetings."</p> <p>8 Were there other meetings you knew he</p> <p>9 attended?</p> <p>10 THE WITNESS: I don't understand this</p> <p>11 question, Brenda.</p> <p>12 Q. (BY MR. FREEMAN) That's -- that's okay, Jane.</p> <p>13 We'll -- we'll move on.</p> <p>14 A. Okay.</p> <p>15 Q. I'm not sure I understand it, either.</p> <p>16 Let me ask you about David Hook.</p> <p>17 Do you know who David Hook is?</p> <p>18 A. I actually -- or, I'm not familiar with him.</p> <p>19 Q. Okay.</p> <p>20 A. I never talked to him.</p> <p>21 Q. Do you have any idea who he is or...?</p> <p>22 A. This --</p> <p>23 MS. HARD-WILSON: Objection; form.</p> <p>24 A. This name sound familiar to me, but I --</p> <p>25 I'm -- I don't know this person.</p>	<p>1 A. When?</p> <p>2 Q. Yes, ma'am.</p> <p>3 A. We wire them \$400 every month if we have</p> <p>4 money in the bank.</p> <p>5 Q. \$400?</p> <p>6 A. Yes.</p> <p>7 Q. Or 4 -- 400,000?</p> <p>8 A. No. \$400. Just 400.</p> <p>9 Q. From Windspeed?</p> <p>10 A. Mm-hm.</p> <p>11 Q. What is that \$400 for?</p> <p>12 A. I do not know.</p> <p>13 Q. Do -- do you currently wire that money to</p> <p>14 Windspeed [verbatim]?</p> <p>15 MS. HARD-WILSON: Objection; form.</p> <p>16 A. You mean recently? No.</p> <p>17 Q. (BY MR. FREEMAN) When's the last time you</p> <p>18 wired money to Super G?</p> <p>19 A. Two months -- three months ago.</p> <p>20 Q. How much was it?</p> <p>21 A. Four hundred.</p> <p>22 Q. And --</p> <p>23 A. If -- no. I think -- I think -- I do not</p> <p>24 remember, but it -- it -- it should be 400.</p> <p>25 Q. You don't know what it was for?</p>
Page 31	Page 33
<p>1 Q. (BY MR. FREEMAN) Okay. What about Tony</p> <p>2 Ludlow or Anthony Ludlow?</p> <p>3 A. No.</p> <p>4 Q. No?</p> <p>5 A. Anthony sounds familiar to me, but I -- I</p> <p>6 never met him and I don't know about him.</p> <p>7 Q. Okay.</p> <p>8 A. I only met Matt.</p> <p>9 Q. Okay. What about a gentleman named Marc</p> <p>10 Cole?</p> <p>11 A. No, I don't know him.</p> <p>12 Q. Steven Bellah?</p> <p>13 A. No.</p> <p>14 Q. Are you familiar with a company called</p> <p>15 Super G Capital?</p> <p>16 A. Yes. Not familiar, but I know this.</p> <p>17 Q. Okay. Who is Super G Capital?</p> <p>18 A. No, I don't know that -- I don't know that</p> <p>19 too much.</p> <p>20 Q. What do you know about Super G Capital?</p> <p>21 A. We route them money. That's my job.</p> <p>22 Q. Brought them money?</p> <p>23 A. I do wire transfer. I transfer money to</p> <p>24 Super G.</p> <p>25 Q. When would you transfer money to Super G?</p>	<p>1 A. No. I just do whatever Bill told me.</p> <p>2 Q. Are you familiar with ACET Global's business,</p> <p>3 with what it was?</p> <p>4 A. Yeah. I worked for them for a few months.</p> <p>5 Q. What type of business was it?</p> <p>6 A. It was e-commerce.</p> <p>7 Q. Okay. And what does that mean?</p> <p>8 A. Like, we -- we buy inventories and we sell</p> <p>9 inventories.</p> <p>10 Q. And what kind of inventories?</p> <p>11 A. Products.</p> <p>12 Q. Certain kinds of products?</p> <p>13 A. Certain kind? No, just various.</p> <p>14 Q. Various?</p> <p>15 A. Yes.</p> <p>16 Q. Were they standard products? Were they</p> <p>17 unique products?</p> <p>18 A. What does "standard products" mean?</p> <p>19 Q. I'm just trying to understand what -- what</p> <p>20 exactly it was your -- your products were.</p> <p>21 A. Just different kinds.</p> <p>22 Q. Okay. What -- what different kinds? Can you</p> <p>23 give me examples?</p> <p>24 A. Yes. Like -- you mean under ACET Global?</p> <p>25 Q. Yes, ma'am.</p>

Page 34	Page 36
<p>1 A. Oh. I -- actually, I -- I don't -- I'm not 2 sure about ACET Global products now. I -- I cannot -- 3 I cannot recall. 4 Q. Were they -- 5 A. But we -- 6 Q. Were they way different than what you're -- 7 than what Windspeed sells? 8 A. No, they were almost the same. But we just 9 have new products now, and I'm more familiar with 10 Windspeed's products. 11 Q. It's been a little while? 12 A. Uh-huh. 13 Q. (BY MR. FREEMAN) Are they -- they were pretty 14 much the same, like the same basic products? 15 A. Yes. 16 Q. Okay. Almost the exact -- 17 A. Mm-hm. 18 Q. -- same products? 19 MR. PERRIN: Objection; form. 20 MS. HARD-WILSON: Objection; form. 21 A. Not exact the same, but just the same 22 categories. 23 MR. FREEMAN: Can we go off the record 24 for a second? 25 MS. HARD-WILSON: Sure.</p>	<p>1 not -- I'm not sure it was for ACET lor -- you know, 2 because I work for ACET a few months and I got train 3 out in accounting. I didn't -- I'm not -- I was not 4 familiar with those Web site. 5 Q. Okay. Where did -- was there another one, 6 named luluway.com? 7 A. Luluway? I've heard of this one but I do not 8 know about it. 9 Q. Okay. Where did ACET Global operate? 10 A. Where? 11 Q. Yes, ma'am. 12 A. Richardson -- oh. No. Oh. Okay. It was 13 not Richardson. It was 1501 10th Street. It was -- 14 the address was 1501 10th Street of -- okay. I -- 15 we're not -- I do not remember the full address now. 16 Is that 1501 10th Street? 17 Something like that. I have to check. 18 Q. Okay. 19 A. It was in south Plano. 20 Q. Jane, is that your answer? 21 A. Yes. Still in Dallas, you know, the city. 22 Are you asking me the address? 23 Q. Well, you were giving me the address. I was 24 trying to understand what your answer was. I heard 25 "Richardson."</p>
Page 35	Page 37
<p>1 (Break from 10:21 a.m. to 10:22 a.m.) 2 Q. (BY MR. FREEMAN) Jane, you were -- you were 3 referring to the inventory at ACET Global. Anything 4 else you can tell me about the inventory? 5 A. No, because I'm doing accounting. 6 Q. Okay. So, in accounting, you didn't have 7 involvement with the inventory? 8 A. No. 9 Q. Is anyone providing you with input right now 10 about this deposition? 11 A. What does that mean? 12 Q. You're not receiving any messages about this 13 deposition currently, are you? 14 A. You mean right now? 15 Q. Yes. 16 A. No. 17 Q. Not from Mr. Szeto? 18 A. No. 19 Q. Okay. What Web sites did ACET Global 20 operate? 21 A. Wow, ACET Global Web site? 22 Q. Yes, ma'am. 23 A. I do not remember. 24 Q. Was there a koolulu.com? 25 A. I've heard -- I've heard of this one, but I'm</p>	<p>1 A. No, no. It was not Richardson. Sorry. I 2 remembered wrong. I said wrong. 3 Okay. It was south Plano. 4 Windspeed is in Richardson. 5 Q. Okay. So it was in south Plano? 6 A. Yes. 7 Q. And where did you get 1501 from? 8 A. That was the -- my old address for my old 9 office when I worked for ACET Global. 10 Q. Were there other people involved in ACET 11 Global? 12 A. Other people? So you mean the employees for 13 ACET Global? 14 Q. Yes, ma'am, or -- or anyone else who worked 15 with ACET Global. 16 THE WITNESS: I can answer this 17 question, right, Brenda? 18 MS. HARD-WILSON: Yes. 19 A. Sai and Dana, Paula, Vanessa, me, William 20 Szeto, and Shira [phonetic], Monica. I -- that's it. 21 Q. (BY MR. FREEMAN) Okay. What about Matt 22 Denegre? 23 A. No. 24 Q. Did he have any role? 25 A. No.</p>

Page 38	Page 40
<p>1 Q. How did ACET Global perform? Was it doing 2 well or doing bad? 3 A. ACET Global doing? I do not remember the 4 financials, but not very good. 5 Q. Not very good. 6 Why do you say that? 7 A. I do not remember, but -- I really do not 8 remember. It's been too long. 9 Q. That -- that was your job, right, was 10 accounting? 11 A. Right. 12 Q. Who else would be the person that would -- 13 would do accounting? 14 A. Shira [phonetic]. 15 Q. Shira? So if I needed somebody who would 16 remember that, I would need to ask Shira? 17 A. She trained me. 18 For -- for ACET Global financials, I 19 really -- I really do not remember the -- you know. 20 But I -- 21 Q. How -- 22 A. -- don't think that's too good. 23 Q. How is it that you're able to say it was not 24 doing good? 25 A. I do not remember, to be honest.</p>	<p>1 Q. (BY MR. FREEMAN) Let me ask you a different 2 one. 3 Did Mr. Szeto ever say he was concerned 4 about ACET Global's performance? 5 A. I do not remember. 6 Q. At the time that ACET Global changed to 7 Windspeed, were you the only person in accounting? 8 A. Yes. 9 Q. Okay. Did Mr. Szeto ever discuss financial 10 matters with you? 11 A. Yes. 12 Q. Did he discuss accounting with you? 13 A. Yeah. He always told me to finish the 14 report. 15 Q. Did he discuss budgets with you? 16 A. He -- he just told me what to do. 17 It's not negotiation; just, he just told 18 me what to do. 19 Q. Okay. And what do you mean by that? 20 A. Like, so I just follow his instructions, 21 like, okay, if we should pay bills today or next week, 22 like. 23 Q. Did he ever discuss revenues with you? 24 A. No. 25 Q. He never said he was concerned about ACET</p>
Page 39	Page 41
<p>1 Q. Okay. So you don't -- you don't really know 2 if it was doing good or bad? 3 A. I -- I do not remember. 4 Q. Okay. 5 A. Mm-hm. Because, I was new at that time and I 6 got trained. I was not too -- you know, not like when 7 I work for Windspeed. 8 Q. How long did you work for ACET Global? 9 A. From -- from March to September. 10 Q. How long was Shira working for ACET Global? 11 A. I do not know. She left. She left in -- she 12 left -- after finished training me, she left. 13 Q. How long did she train you? 14 A. Over a month. 15 Q. So she left sometime in April -- 16 A. I do not -- 17 Q. -- of 2018? 18 A. I do not remember the exact day. 19 Q. Okay. Was anyone else at ACET Global 20 concerned about its economic performance? 21 A. I don't know. 22 Q. Did management at ACET Global ever express 23 concern about its economic performance? 24 MR. PERRIN: Objection; form. 25 A. Okay, I don't understand this question.</p>	<p>1 Global's revenue level? 2 A. I do not remember, no. 3 Q. Did he ever say anything like that about 4 revenues? 5 A. I do not remember, for ACET. 6 Q. And you don't remember him ever saying that 7 he was concerned that ACET was -- 8 A. No. 9 Q. -- was not doing well? 10 A. No. 11 Q. Did anyone ever else ever say they were 12 concerned about ACET Global not doing well? 13 A. No. 14 Q. Did you ever have any meetings to discuss 15 whether ACET Global was doing well? 16 A. I -- we -- we did have meetings at that time, 17 but I do not remember what was said in the meetings. 18 Q. You don't remember any meetings discussing -- 19 A. No. 20 Q. -- what type of -- 21 A. I do not remember that. It's been too long. 22 Q. Did anyone ever discuss whether ACET Global 23 was profitable? 24 A. No, I do not remember that. 25 Q. No.</p>

Page 42

1 Did anyone ever say that ACET Global was
2 failing?
3 A. Was failing? No.
4 Q. No? No one ever -- no one ever said that
5 this business --
6 A. I do -- I do not remember.
7 Q. Anyone ever saying that?
8 A. No, I don't remember.
9 MR. PERRIN: Objection; form.
10 Q. (BY MR. FREEMAN) And you don't remember
11 Mr. Szeto ever saying that, do you?
12 A. No.
13 MR. PERRIN: Objection; form.
14 Q. (BY MR. FREEMAN) Jane, did Mr. Szeto ever say
15 that the business was failing?
16 A. No --
17 MS. HARD-WILSON: Objection; form.
18 A. -- I don't remember.
19 Q. (BY MR. FREEMAN) Do you know anything about
20 the firing of -- of Tomer Danti?
21 A. No.
22 Q. Okay. Did you ever discuss his firing with
23 anyone?
24 A. No, never. No.
25 Q. Okay. When did you first hear about

Page 43

1 Windspeed?
2 A. End of -- end of September 2018.
3 Q. And who did you hear about it from?
4 A. My boss.
5 Q. And what did your boss say about it?
6 A. I got rehired.
7 Q. Did you have an interview with him?
8 A. No.
9 Q. Did he just tell you you were going to be
10 rehired under Windspeed?
11 A. Yes.
12 Q. Did he tell you anything else about
13 Windspeed?
14 A. Anything else?
15 Q. Yes, ma'am.
16 A. I will be doing accounting as well.
17 Q. Did he say you would be doing the same thing
18 under Windspeed?
19 A. Mm-hm. Accounting, yes.
20 Q. He said you'd be doing the same thing that
21 you did for ACET Global?
22 MR. PERRIN: Objection; form.
23 A. No. He said I will be hired as an
24 accountant.
25 Q. Okay. So he didn't say you'd be doing the

Page 44

1 same thing under -- under Windspeed that you did for
2 ACET Global?
3 A. He didn't --
4 MR. PERRIN: Object to form.
5 A. -- say that; he said I will be hired as an
6 accountant for Windspeed.
7 Q. (BY MR. FREEMAN) Was there another accountant
8 hired for Windspeed?
9 A. No.
10 Q. So you were the only accountant for
11 Windspeed?
12 A. Yes.
13 Q. And have you been the only accountant for
14 Windspeed --
15 A. Yes.
16 Q. -- since it was formed?
17 A. (Nodding head.)
18 Q. Can you say that verbally, please?
19 A. Yes.
20 Q. Did you receive a formal offer of employment
21 from Windspeed?
22 A. I do not remember. I really do not remember.
23 I have to check.
24 Q. Did you have an employment contract with
25 Windspeed?

Page 45

1 A. He send us e-mails.
2 Q. What did those e-mails say?
3 A. I do not remember the -- I have to check.
4 But he informed us.
5 Q. Okay.
6 A. I really --
7 Q. Did he inform all of the employees?
8 A. I think so.
9 Q. Was everyone that was employed at ACET Global
10 at that time -- was everyone rehired by Windspeed?
11 A. No.
12 Q. Who was not?
13 A. Shira was not. Monica was not.
14 Q. Did Shira work at ACET Global when Windspeed
15 was formed?
16 A. No. She left.
17 Q. Did Monica work at ACET Global when Windspeed
18 was formed?
19 A. I'm confused about this question. Can you
20 please...?
21 Q. Yeah. Jane, when Windspeed was formed in --
22 A. Mm-hm.
23 Q. -- September of 2018 --
24 A. Mm-hm.
25 Q. -- did Monica work at ACET Global?

<p style="text-align: right;">Page 46</p> <p>1 A. ACET Global was closed.</p> <p>2 Q. Okay. When did Monica stop working for ACET</p> <p>3 Global?</p> <p>4 A. I do not remember the exact date, but it's</p> <p>5 after -- a few months after I started working here.</p> <p>6 Q. Okay.</p> <p>7 A. Mm-hm.</p> <p>8 Q. When was ACET Global closed?</p> <p>9 A. When ACET Global closed? September.</p> <p>10 Q. Of 2018?</p> <p>11 A. Yes.</p> <p>12 Q. And what do you mean by "closed"?</p> <p>13 A. We got terminated by ACET Global and just --</p> <p>14 I don't -- I just didn't work for ACET Global.</p> <p>15 Q. Okay. What about its -- what about its</p> <p>16 inventory, ACET Global's inventory? What happened to</p> <p>17 it?</p> <p>18 A. I -- I do not know too much about inventory.</p> <p>19 Q. How did you account for it? You had to have</p> <p>20 done that in your accounting, right?</p> <p>21 MR. PERRIN: Objection; form.</p> <p>22 THE WITNESS: Should I answer or not?</p> <p>23 So objection --</p> <p>24 MS. HARD-WILSON: Yes, you can answer.</p> <p>25 A. The inventory? So can you repeat your</p>	<p style="text-align: right;">Page 48</p> <p>1 shipped out?</p> <p>2 A. Okay. Because mostly I just -- I just make</p> <p>3 invoices every day.</p> <p>4 Like, whatever we ship -- whatever items</p> <p>5 we ship out to different marketplaces, I just invoice</p> <p>6 them.</p> <p>7 Q. Okay. And are you talking about when you</p> <p>8 were at ACET Global or when you were --</p> <p>9 A. Windspeed.</p> <p>10 Q. -- at Windspeed?</p> <p>11 Windspeed?</p> <p>12 A. Windspeed.</p> <p>13 Q. Okay. How did Windspeed have inventory to</p> <p>14 sell?</p> <p>15 A. We bought a lot of things.</p> <p>16 Q. Did it begin shipping out inventory when it</p> <p>17 was formed?</p> <p>18 A. I have to check the -- I have to check; but,</p> <p>19 yes, we keep selling.</p> <p>20 Q. I'm sorry?</p> <p>21 A. Well, you mean for Windspeed?</p> <p>22 Q. Yes, ma'am.</p> <p>23 A. I have to check the -- I have to check</p> <p>24 because I do not remember, for the first few months,</p> <p>25 what that -- what did it look like.</p>
<p style="text-align: right;">Page 47</p> <p>1 question again, please?</p> <p>2 Q. (BY MR. FREEMAN) Yes, ma'am.</p> <p>3 So just to put it back in context, Jane,</p> <p>4 you said ACET Global closed in September --</p> <p>5 A. Mm-hm.</p> <p>6 Q. -- of 2018; is that correct?</p> <p>7 A. September 2018, yes.</p> <p>8 Q. Okay. So y'all stopped operating ACET Global</p> <p>9 at that time; is that correct?</p> <p>10 A. Yes.</p> <p>11 Q. Okay. What happened to ACET Global's assets?</p> <p>12 A. ACET Global's assets? You mean inventory,</p> <p>13 those items?</p> <p>14 Q. Inventory is one set of assets, yes, ma'am.</p> <p>15 A. So are you asking asset -- all the assets or</p> <p>16 are you asking specifically for inventory?</p> <p>17 Q. Let's start with all of the assets.</p> <p>18 What happened to all of the assets?</p> <p>19 A. Okay. We moved the desk, cabinets to a new</p> <p>20 place.</p> <p>21 Q. What else?</p> <p>22 A. And for inventories, I just invoice whatever</p> <p>23 we shipped out, so I -- I -- I do not remember for</p> <p>24 those old inventory things.</p> <p>25 Q. And what do you mean by invoiced whatever was</p>	<p style="text-align: right;">Page 49</p> <p>1 Q. Do you remember after that?</p> <p>2 A. After a few months?</p> <p>3 Q. Yes, ma'am.</p> <p>4 A. Okay. After a few months what?</p> <p>5 Q. I'm just trying to figure out where you --</p> <p>6 kind of where you remember from; what point in time</p> <p>7 you remember.</p> <p>8 A. Remember?</p> <p>9 Q. Did -- did Windspeed begin -- was Windspeed</p> <p>10 selling the inventory from ACET Global?</p> <p>11 A. Did Windspeed -- okay. I remember.</p> <p>12 We bought a lot of new inventories for</p> <p>13 Windspeed, but there were some old ones from ACET</p> <p>14 Global that were mixed up.</p> <p>15 Q. And what do you mean by "mixed up"?</p> <p>16 A. My phone is ringing.</p> <p>17 So, like -- like, for the same items,</p> <p>18 probably we bought -- probably -- like, for example,</p> <p>19 this is an item we sold for ACET but we still bought a</p> <p>20 lot of this kind of item for Windspeed.</p> <p>21 Q. Okay. Were you involved in -- did you buy</p> <p>22 those items --</p> <p>23 A. No.</p> <p>24 Q. -- for Windspeed?</p> <p>25 A. No.</p>

Page 50	Page 52
<p>1 Q. How is it that you know that?</p> <p>2 A. Because be I invoice them, I made purchasing</p> <p>3 orders.</p> <p>4 Q. So you did buy the --</p> <p>5 A. No, I didn't buy them.</p> <p>6 Q. But you issued purchase orders?</p> <p>7 A. Okay. We don't issue this to our vendors,</p> <p>8 no; I just record them.</p> <p>9 Q. Okay. What -- tell me exactly what you did</p> <p>10 with respect to inventory.</p> <p>11 A. Okay.</p> <p>12 When we bought something and they let me</p> <p>13 know, and I just recorded the purchases in my system.</p> <p>14 Q. And did you know specifically what kinds of</p> <p>15 inventory were being bought?</p> <p>16 A. I have that saved in my system, but I do not</p> <p>17 remember because it was too -- too many items.</p> <p>18 Q. Okay. Well, how did you know that they were</p> <p>19 mixed up?</p> <p>20 MR. PERRIN: Objection; form.</p> <p>21 A. Because -- I -- I do not know, to be honest.</p> <p>22 I -- I just -- I just remembered we replenished some</p> <p>23 items, some good-selling items.</p> <p>24 Q. (BY MR. FREEMAN) Some what?</p> <p>25 A. Some -- I -- we replenished some items. I</p>	<p>1 for it immediately when you switched over to</p> <p>2 Windspeed?</p> <p>3 A. Okay. How fast is "immediately"?</p> <p>4 Q. You -- good question.</p> <p>5 So did you start buying inventory for</p> <p>6 Windspeed within a few weeks of switching over?</p> <p>7 A. Yes.</p> <p>8 Q. Okay. Were you -- was Windspeed selling</p> <p>9 inventory before it began buying inventory?</p> <p>10 A. Windspeed? We -- we had most of our new</p> <p>11 products from China. That takes a long time.</p> <p>12 However, we started to buy some local vendor items so</p> <p>13 we sold those pretty fast.</p> <p>14 Q. Who were the local vendors?</p> <p>15 A. Okay. Okay. Right now, I'm not sure about</p> <p>16 the name, but I know the item name is called Crisper,</p> <p>17 like --</p> <p>18 Q. All right.</p> <p>19 A. That's from local.</p> <p>20 But I -- I do not know the name because</p> <p>21 we have a few local vendors. I -- I do not remember</p> <p>22 which vendor was that. I have to check.</p> <p>23 Q. Could you say the name of that item again?</p> <p>24 A. Crispers.</p> <p>25 Q. Crispers?</p>
Page 51	Page 53
<p>1 was told.</p> <p>2 Q. You were told what?</p> <p>3 A. I didn't do any purchasing things because I</p> <p>4 was not -- because I'm only recording, but I was told,</p> <p>5 "Okay, we" -- "we bought new items" or we replenished</p> <p>6 some old items.</p> <p>7 Q. Okay.</p> <p>8 A. Mm-hm.</p> <p>9 Q. And what do you mean by "replenished"?</p> <p>10 A. Like, okay -- okay. "Replenished" means,</p> <p>11 okay, this item was sold under ACET Global, and we</p> <p>12 thought this is a good item so we just replenished</p> <p>13 some of them.</p> <p>14 Q. Do you know who the vendors were?</p> <p>15 A. Yes.</p> <p>16 Q. Were they the same vendors?</p> <p>17 A. Yes.</p> <p>18 Q. Okay. When did you begin replenishing these</p> <p>19 assets?</p> <p>20 A. When? I think, October. Well, after</p> <p>21 Windspeed was established.</p> <p>22 Q. Okay. So you started buying assets very</p> <p>23 quickly after it was started?</p> <p>24 A. (Nodding head.)</p> <p>25 Q. Okay. Did you basically start buying assets</p>	<p>1 A. Yes.</p> <p>2 Q. Do you know how to spell that?</p> <p>3 A. C-R-I-S-P-E-R.</p> <p>4 Q. And what is a Crisper?</p> <p>5 A. I -- I do not know. I never see that. I --</p> <p>6 I do not know.</p> <p>7 Q. It was just some kind of inventory?</p> <p>8 A. Right.</p> <p>9 Q. Okay. Did you deal with any of these local</p> <p>10 vendors?</p> <p>11 A. Yes. I pay bills.</p> <p>12 Q. Okay. Did -- did you place any orders with</p> <p>13 them?</p> <p>14 A. No.</p> <p>15 Q. Did you ever place -- did you ever place any</p> <p>16 purchase orders with any vendors?</p> <p>17 A. No, I didn't. I just -- I just did</p> <p>18 recording.</p> <p>19 Q. Okay. Who placed purchase orders with</p> <p>20 vendors?</p> <p>21 A. Sales manager, Sai.</p> <p>22 Q. Okay. Was that all?</p> <p>23 A. I was not sure about Vanessa. I -- I do not</p> <p>24 know.</p> <p>25 But Sai was the sale manager, so she's</p>

Page 54	Page 56
<p>1 doing most of the purchasings.</p> <p>2 Q. Okay. Did you ever discuss those with Sai?</p> <p>3 A. No.</p> <p>4 Q. Can you describe the transition for me from</p> <p>5 ACET Global to Windspeed?</p> <p>6 A. What transition?</p> <p>7 MS. HARD-WILSON: Objection; form.</p> <p>8 Q. (BY MR. FREEMAN) Just explain to me how the</p> <p>9 transition took place.</p> <p>10 MR. PERRIN: Objection; form.</p> <p>11 MS. HARD-WILSON: Objection; form.</p> <p>12 Q. (BY MR. FREEMAN) You can answer, Jane.</p> <p>13 A. I -- we got a terminated letter from Bill.</p> <p>14 It said, okay, ACET Global was closed and you were</p> <p>15 terminated by ACET Global. And he informed us, "Okay,</p> <p>16 you" -- "you are rehired for Windspeed."</p> <p>17 Q. Was each person that received one of those</p> <p>18 termination letters -- were they then rehired by</p> <p>19 Windspeed?</p> <p>20 A. I got one.</p> <p>21 Q. Did each person that was at ACET Global that</p> <p>22 received one of those termination letters -- did they</p> <p>23 begin working for Windspeed?</p> <p>24 A. I think Dana, Sai and Paul did. They did.</p> <p>25 Q. Was there anyone that did not?</p>	<p>1 A. Mm-hm. Yes.</p> <p>2 Q. Okay. And you've told me you began working</p> <p>3 for Windspeed in September of 2018.</p> <p>4 A. Mm-hm.</p> <p>5 Q. Is that correct?</p> <p>6 A. End of September. September 30th or October.</p> <p>7 I do not remember exact date, but that time.</p> <p>8 Q. And I'm not trying to trick you on the date.</p> <p>9 Let's call it -- let's call it October.</p> <p>10 A. Okay.</p> <p>11 Q. So you began working for Windspeed -- or, you</p> <p>12 were working for Windspeed in October of 2018 --</p> <p>13 A. Yes.</p> <p>14 Q. -- right?</p> <p>15 Was Bill working for Windspeed in</p> <p>16 October of 2018?</p> <p>17 A. Yes.</p> <p>18 Q. Was Sai working for Windspeed in October of</p> <p>19 2018?</p> <p>20 A. Yes.</p> <p>21 Q. Was Dana working for Windspeed in October of</p> <p>22 2018?</p> <p>23 A. Yes.</p> <p>24 Q. Was Paula working for Windspeed in October of</p> <p>25 2018?</p>
Page 55	Page 57
<p>1 A. Vanessa, I -- I'm not sure because she left</p> <p>2 much earlier. I -- I'm not -- because we didn't talk</p> <p>3 to each other about that.</p> <p>4 I got -- I got mine.</p> <p>5 Q. And I'm -- I'm not asking about the people</p> <p>6 who had already left or who may have already been</p> <p>7 fired but just the people who were working there then.</p> <p>8 A. Vanessa worked for Windspeed then.</p> <p>9 Q. And she didn't -- oh, she worked for</p> <p>10 Windspeed or -- or -- or ACET Global?</p> <p>11 A. Both.</p> <p>12 Q. Okay. Was there anybody who was working at</p> <p>13 Acet Global at that time, call it September of 2018,</p> <p>14 who did not later begin working for Windspeed?</p> <p>15 A. Okay. So can -- I don't understand this</p> <p>16 question. Too long.</p> <p>17 Q. Let -- let's do it this way: Can you tell me</p> <p>18 each person who was working for Acet Global as of</p> <p>19 September of 2018?</p> <p>20 A. Me, Bill, Vanessa, Sai, Dana, Paula.</p> <p>21 Q. Okay.</p> <p>22 A. You mean September, right?</p> <p>23 Q. Yes, ma'am.</p> <p>24 A. Mm-hm.</p> <p>25 Q. September of 2018, correct?</p>	<p>1 A. Yes.</p> <p>2 Q. Was Vanessa working for Windspeed in October</p> <p>3 of 2018?</p> <p>4 A. Yes.</p> <p>5 Q. Tell me more about the transition from ACET</p> <p>6 Global to Windspeed.</p> <p>7 MS. HARD-WILSON: Objection; form.</p> <p>8 Q. (BY MR. FREEMAN) What do you remember about</p> <p>9 it?</p> <p>10 A. We moved out from an office and we started</p> <p>11 everything new as Windspeed, and we got our own e-mail</p> <p>12 address, the new ones; just, that's it.</p> <p>13 MS. HARD-WILSON: Jason, would this be a</p> <p>14 good time to take a break?</p> <p>15 MR. FREEMAN: I think it would, Brenda.</p> <p>16 That would be fine.</p> <p>17 (Break from 10:53 a.m. to 11:15 a.m.)</p> <p>18 MR. FREEMAN: All right. Just a</p> <p>19 housekeeping matter: Want to reflect that the parties</p> <p>20 have a mutual agreement amongst themselves that one</p> <p>21 objection on behalf of either of the -- any of the</p> <p>22 defendants will also serve as an objection for the</p> <p>23 others.</p> <p>24 I get that correct?</p> <p>25 MR. PERRIN: Correct. Agreed.</p>

<p style="text-align: right;">Page 58</p> <p>1 MS. HARD-WILSON: Yes. Agreed. 2 And another matter we wanted to get on 3 the record was, during the break, we had a sidebar 4 discussing whether or not the deponent may be getting 5 answers from another source, and we wanted to revisit 6 that. 7 So, Jane, if you could confirm, are you 8 receiving any messages through any device regarding 9 the answers to your testimony today? 10 THE WITNESS: No. 11 MS. HARD-WILSON: Are you communicating 12 with anyone through your tablet, your cell phone? Is 13 there anyone in the room with you? 14 THE WITNESS: No. 15 MS. HARD-WILSON: So all of the 16 testimony you give today is from your own 17 recollection? 18 THE WITNESS: Yes. 19 MS. HARD-WILSON: Okay. Thank you. 20 MR. FREEMAN: Thank you, Brenda. I 21 appreciate that. 22 MS. HARD-WILSON: Of course. 23 Q. (BY MR. FREEMAN) Jane, thanks for your 24 patience through this. 25 We were talking about the transition</p>	<p style="text-align: right;">Page 60</p> <p>1 Q. Yes, ma'am. 2 A. No. 3 Q. Were there any meetings about it? 4 A. Meetings? 5 Q. Yes, ma'am. 6 A. No. I think it was termination letter. 7 Q. And one -- one last question. 8 Were there any phone calls about it? 9 A. No, I don't -- I don't remember and I don't 10 think so. 11 THE WITNESS: Sorry. I have to mute my 12 phone. Sorry. 13 MR. FREEMAN: That's okay. 14 Q. (BY MR. FREEMAN) How did Windspeed compare to 15 ACET Global? 16 A. In what aspect? What -- what do you mean? 17 Q. How -- yeah. I mean, did they have different 18 businesses? 19 MR. PERRIN: Objection; form. 20 A. They are doing e-commerce, too. They were 21 doing e-commerce, too. 22 Q. (BY MR. FREEMAN) And how was it different 23 from like what ACET Global was doing? 24 A. Actually, I'm doing kind of same thing. 25 Q. What about others? Were the other employees</p>
<p style="text-align: right;">Page 59</p> <p>1 from ACET Global to Windspeed Trading. Could you tell 2 me again just what you remember about that transition 3 to Windspeed? 4 A. Yes. 5 I got a termination letter from Bill, 6 end of September, for ACET Global, and he rehired me 7 back for Windspeed since October. 8 Q. And did you -- did you begin working for 9 Windspeed quickly after that? 10 A. I think it was pretty quick. 11 Q. Okay. Did you -- do you recall, did you take 12 any time off between? 13 A. I -- I don't remember that; but I can -- was 14 so quick. 15 Q. Did you receive any other communications 16 about this transition? 17 A. No -- what communication? 18 Q. Did you receive any e-mails about it? 19 A. About what? 20 Q. Changing to Windspeed. 21 A. I just got the termination letter. 22 Q. So not any other e-mails? 23 A. No. Just that. 24 Q. Were there any texts? 25 A. For ACET Global closing? No.</p>	<p style="text-align: right;">Page 61</p> <p>1 doing the same thing? 2 A. I think so. 3 Q. Were -- was the business different? 4 A. No. E-commerce. Same -- same thing. 5 Q. Same thing? 6 A. Mm-hm. 7 Q. Was it selling the same types of products? 8 A. Yes, same type. 9 Q. Same inventory was being sold? 10 A. Mm-hm. 11 MR. PERRIN: Object to form. 12 A. But not the same item, but same kind of 13 products. 14 Q. (BY MR. FREEMAN) Okay. Same kind of 15 products? 16 A. Mm-hm. 17 Q. Were there different types of customers or 18 was it the same kinds of customers? 19 A. Same kinds of customers. 20 Q. Was it being marketed differently or was it 21 same kind of marketing? 22 A. I don't understand "marketing" here. Is that 23 how we sell to them? 24 Q. Yeah, or advertising. 25 A. I don't do sales.</p>

Page 62	Page 64
<p>1 Q. Okay. Did you know anything about the Web 2 sites? 3 A. Web site? 4 Q. Yes, ma'am. 5 A. I -- I don't use that Web site. 6 Q. Okay. 7 A. And I didn't create it. 8 Q. Did you have any involvement with it? 9 A. No. 10 Q. Okay. 11 A. Mm-hm. 12 Q. Do you know if Windspeed had a different logo 13 than ACET Global? 14 A. I don't -- I don't know if we have a logo. 15 Q. Okay. 16 Okay. Did it ever use the same office 17 space? 18 A. I think we moved out. As Windspeed, we moved 19 out of the other office. 20 Q. So your testimony is, it -- Windspeed never 21 used the same office? 22 A. I -- I -- I'm not sure. I do not remember 23 that. 24 But we moved out after we were 25 Windspeed.</p>	<p>1 I do not remember the contents, but I 2 did receive e-mails from him before. 3 Q. Okay. Did you ever have e-mails addressing 4 anything of substance with the business? 5 A. No. As Windspeed? You mean as Windspeed? 6 No. 7 Q. Yeah. Any e-mails with Matt Denegre? 8 A. As Windspeed, no. No. 9 Q. Okay. Any e-mails discussing inventory -- 10 A. No. 11 Q. -- with Matt Denegre? 12 A. No. 13 Q. Any e-mails discussing taxes with Matt 14 Denegre? 15 A. No. 16 Q. Any e-mails discussing anything financial 17 with Matt Denegre? 18 A. No. 19 Q. Did you -- did you have any e-mails with Matt 20 Denegre regarding ACET Global's inventory? 21 A. No. I -- I don't report to him. 22 Q. Okay. Did -- did you ever have any e-mails 23 with Matt Denegre discussing ACET Global's taxes? 24 A. No. 25 Q. Or regarding ACET Global's --</p>
Page 63	Page 65
<p>1 Q. Okay. Did you ever have any involvement with 2 Matt Denegre while -- 3 A. No. 4 Q. -- while you were at Windspeed? 5 A. No. 6 Q. Did you ever communicate with him? 7 A. No. 8 Q. Do you ever have phone calls with him? 9 A. I had phone call with him but not -- I had 10 phone calls with him. 11 Q. What were those phone calls about? 12 A. Just introduce, just say hi, like. Because 13 we were Windspeed at that time, probably just to -- 14 just say hi. 15 Q. Never discussed anything of -- 16 A. No. 17 Q. -- substance? 18 A. No. 19 Q. Did -- did you ever have any e-mails with 20 Matt Denegre? 21 A. E-mails? 22 Q. Yes, ma'am. 23 A. I'm pretty sure I received his e-mails 24 before, but I do not remember what are they -- what -- 25 what were they.</p>	<p>1 A. No. 2 Q. -- taxes? 3 No? 4 A. No. 5 Q. What about day David Hook? 6 A. No. I -- I never received e-mails from 7 David, no. I don't know him. 8 Q. Okay. And what about Anthony Ludlow? 9 A. No. 10 Q. Okay. 11 A. I only know Matt. 12 Q. Okay. I want to go back, just stay on this 13 topic of the transition from ACET Global to Windspeed 14 Trading. 15 Why did the business change? 16 A. I really -- I didn't get involved with it. I 17 just -- I just was told, "Okay" -- "Okay, right now, 18 you are the employee for Windspeed." 19 Q. And who informed you it was changing? 20 A. William Szeto. 21 Q. Okay. And can you describe to me some 22 specific ways that it -- it changed? 23 A. He just told us, "ACET Global was closed and 24 you are terminated; and I got a new offer," and he 25 says start from October.</p>

17 (Pages 62 to 65)

Page 66

1 Q. Okay.
2 A. Mm-hm.
3 Q. Was there any other way that the business
4 changed?
5 A. I think we were doing the same e-commerce.
6 Q. Were you doing exactly the same thing or was
7 it something different?
8 A. I cannot tell the difference.
9 Q. Okay. Could any -- who could have told the
10 difference?
11 A. I still do invoicing, pay bills, payrolls,
12 those accounting things.
13 Q. Was there anything that you felt changed
14 about the business model?
15 MR. PERRIN: Objection; form.
16 A. I do not. I -- I cannot tell the difference.
17 Q. (BY MR. FREEMAN) Okay. Did you ever discuss
18 that with any other employees of Windspeed?
19 A. Discuss the difference?
20 Q. Yes, ma'am.
21 A. No.
22 Q. Did anyone ever ask why it changed?
23 A. No.
24 Q. No one ever discussed why it changed?
25 A. I -- I didn't see any change.

Page 67

1 Q. Okay. Did anyone else ever say they saw any
2 change?
3 A. No.
4 Q. Okay. Did anyone's title change?
5 A. Sai is a manager. Probably, when Monica was
6 here, she was not a manager.
7 Q. So Sai's title changed to be a manager?
8 A. I -- I'm -- actually, we don't know anything
9 about the title, but she -- I think she became a
10 manager in -- in Windspeed.
11 Q. Okay.
12 A. Mm-hm.
13 Q. Okay. But you don't know what Sai's title
14 was before that?
15 A. No, because Monica -- when Monica was here, I
16 think Monica was a manager.
17 Q. Okay. And did the e-mail addresses change?
18 A. Yes.
19 Q. Did you ever use your ACET Global e-mail
20 address after that?
21 A. No.
22 Q. Did anyone use their Acet Global e-mail
23 address?
24 A. No.
25 Q. No.

Page 68

1 Did the Web site for the business
2 change?
3 A. We have a new Web site after Windspeed was
4 established.
5 Q. Okay. How was it different?
6 A. Different? I don't -- I don't know anything
7 about the Web site because I don't use that.
8 Q. Okay. Do you remember -- from being the
9 accountant, do you remember payments being made to
10 anyone to develop a Web site?
11 A. I think the Web site was linked, you know, to
12 our bank card. They charge was automatically. I
13 don't pay for it.
14 Q. Okay.
15 A. Uh-huh.
16 Q. Who is it linked to?
17 A. Linked to what?
18 Q. Who -- who does it pay automatically?
19 A. Who?
20 Q. Yes, ma'am.
21 A. I think the -- you mean the Web site name?
22 Q. Who -- who is being paid to help with the Web
23 site?
24 A. Who is being paid? You mean who is taking
25 care of the Web site?

Page 69

1 Q. Yes, ma'am.
2 A. I think it's Vanessa. Vanessa.
3 Q. Okay. So Vanessa would be the person to ask
4 about that?
5 A. Ask about the Web site?
6 Q. Yes, ma'am.
7 A. I think she -- she was the one who takes care
8 of that --
9 Q. Okay.
10 A. -- Web site.
11 Q. Okay. Were you asked to do anything to
12 facilitate the change to Windspeed?
13 A. What -- what do you mean?
14 Q. Were you asked to do anything to help with
15 the change to Windspeed?
16 A. Yes. I think we hired the contractors for us
17 to -- moving companies, and I paid for them.
18 Q. Okay.
19 A. I'm taking care of the payment.
20 Q. Okay. Was there anything else?
21 A. No, I don't -- I don't know.
22 Q. Okay. Were any of the other employees asked
23 to do anything to help with the change?
24 A. I don't know. You have to ask them.
25 Q. Okay. Were there any discussions about what

Page 70	Page 72
<p>1 to do with ACET Global's inventory?</p> <p>2 A. I don't get involved with those inventory</p> <p>3 things.</p> <p>4 Q. Okay. Was there any discussion about a</p> <p>5 foreclosure sale on the inventory?</p> <p>6 A. Foreclosure sales? You mean giving customer</p> <p>7 discount or...?</p> <p>8 Q. No, ma'am. I mean maybe a lender having a</p> <p>9 foreclosure on ACET Global's inventory.</p> <p>10 A. I do not know that. I -- I didn't do sales.</p> <p>11 Q. Do you remember if Windspeed ever bought any</p> <p>12 assets in a foreclosure sale?</p> <p>13 A. Windspeed ever bought assets? Because I'm --</p> <p>14 I'm not sure. I'm really not sure.</p> <p>15 I cannot say I know because I'm really</p> <p>16 not sure.</p> <p>17 Q. Do you ever remember Windspeed buying</p> <p>18 \$500,000 or more worth of assets?</p> <p>19 A. I don't know. I think I worked from -- I</p> <p>20 worked from home for a few weeks at that time, so I</p> <p>21 didn't get involved that much.</p> <p>22 Q. At -- at what time is that?</p> <p>23 A. I don't remember.</p> <p>24 I remember I worked from home because we</p> <p>25 moved out from the office to the storage units first;</p>	<p>1 I just know we have new products and we</p> <p>2 have some same products in the warehouse, but I -- I</p> <p>3 really didn't know that.</p> <p>4 Q. (BY MR. FREEMAN) Would that have been a --</p> <p>5 would that have been a lot of inventory, \$500,000</p> <p>6 worth?</p> <p>7 A. I do not remember that.</p> <p>8 Q. How much inventory did Windspeed generally</p> <p>9 have on hand?</p> <p>10 A. Right now?</p> <p>11 Q. Yes, ma'am.</p> <p>12 A. You mean right now? Not too --</p> <p>13 Q. We can start there.</p> <p>14 A. You mean right now, in 2021?</p> <p>15 Q. Yes, ma'am.</p> <p>16 A. We don't have that much.</p> <p>17 Q. How much -- how much does the inventory cost,</p> <p>18 just ballpark?</p> <p>19 A. Because we started drop ships, so that's why</p> <p>20 we stopped buying a lot of new inventories for</p> <p>21 Windspeed.</p> <p>22 Q. When did that begin?</p> <p>23 A. Drop ship? Last year.</p> <p>24 Q. Okay. Let me ask it this way: What is the</p> <p>25 most inventory that you remember Windspeed having?</p>
Page 71	Page 73
<p>1 then we moved from storage units to our new office.</p> <p>2 So, as an accountant, I didn't work at</p> <p>3 the storage units; I worked from home. So when -- we</p> <p>4 were lack of, kind of, communications at that time, so</p> <p>5 I didn't get involved so much with those inventories.</p> <p>6 Q. When you were -- as the accountant, would</p> <p>7 you -- I believe I understood your testimony earlier</p> <p>8 to be that you would see all of the purchases of the</p> <p>9 inventory.</p> <p>10 Is that correct?</p> <p>11 A. Yes.</p> <p>12 Q. Do you remember a purchase of inventories at</p> <p>13 any time that was \$500,000 or more of inventory?</p> <p>14 MR. PERRIN: Objection; form.</p> <p>15 A. I do not remember that.</p> <p>16 Q. (BY MR. FREEMAN) Do you remember a purchase</p> <p>17 of inventory in March of 2019 of \$500,000 or more of</p> <p>18 inventory?</p> <p>19 MS. HARD-WILSON: Objection; form.</p> <p>20 A. I do not know.</p> <p>21 Q. (BY MR. FREEMAN) Do you remember in February</p> <p>22 of 2019 a purchase of inventory of \$500,000 or more?</p> <p>23 MS. HARD-WILSON: Objection; form.</p> <p>24 A. Well, actually, I was confused because I</p> <p>25 didn't know -- know too much about inventory.</p>	<p>1 A. The most inventory? The most inventory</p> <p>2 Windspeed having?</p> <p>3 Q. Yes, ma'am.</p> <p>4 A. What does "most inventory" mean? Like, those</p> <p>5 products, where they're from?</p> <p>6 Q. Well, in terms of the dollar amount, did it</p> <p>7 maintain millions of dollars of inventory?</p> <p>8 A. Millions of dollars? I have -- I have to</p> <p>9 check.</p> <p>10 You mean when? Right now, we don't.</p> <p>11 Q. Okay. In 2019, do you remember?</p> <p>12 A. I have to check.</p> <p>13 Q. Okay. Would it have been a lot of inventory,</p> <p>14 for it to purchase \$500,000 of inventory?</p> <p>15 A. I really do not remember the 500,000.</p> <p>16 Q. Okay. Do you remember anyone talking to you</p> <p>17 about buying \$500,000 worth of inventory?</p> <p>18 A. I do not remember that.</p> <p>19 Q. Okay. And you don't remember a foreclosure</p> <p>20 sale?</p> <p>21 A. No.</p> <p>22 Q. Okay. Not a foreclosure sale where Windspeed</p> <p>23 bought --</p> <p>24 A. I've never heard of this word, "foreclosure."</p> <p>25 Q. Okay.</p>

Page 74

1 Do you know if there was -- was ever a
2 time that Windspeed bought ACET Global's old
3 inventory?
4 A. We had ACET Global old inventories in the
5 warehouse at that time, but I -- I'm not sure if we
6 bought those or what -- what's -- what was going on.
7 I do not know.
8 Q. And what do you mean, "at that time"? When
9 are you referring to?
10 A. I think, when we moved out to the storage
11 units, there were some ACET Global old inventories
12 there; but I do not know if we -- you know, how we got
13 those.
14 Q. Okay.
15 A. I was not working the warehouse.
16 Q. Okay. And so was that in 2018?
17 A. Yes.
18 Q. So in 2018 -- in 2018 Windspeed had some of
19 ACET Global's old inventories?
20 MR. PERRIN: Objection; form.
21 A. They were sitting in our warehouse, yes.
22 Q. (BY MR. FREEMAN) Okay. Just to be clear, did
23 Windspeed, in 2018, have all of ACET Global's old
24 inventory that was left?
25 MR. PERRIN: Objection; form.

Page 75

1 A. I do not know if that's all, but I know we
2 had ACET Global old inventory sitting in our
3 warehouse.
4 Q. (BY MR. FREEMAN) Okay. Do you know if
5 Windspeed paid for that inventory?
6 A. So that's a part I really do not know.
7 Q. Okay.
8 A. So...
9 Q. Do you know if -- do you know I if Windspeed
10 ever sold any of that inventory?
11 A. You mean as Windspeed?
12 Q. Yes, ma'am.
13 A. So -- okay. So I know we had old ACET Global
14 inventory in our warehouse and we bought a lot of new
15 items for Windspeed, and this -- they're sitting
16 together; so we -- so it's really hard to, you know,
17 distinguish which one was under ACET or which one was
18 under Windspeed.
19 Q. Do you know if anyone ever tried to
20 distinguish between them?
21 A. No. I don't think so.
22 Q. Did anyone ever ask you to prepare an
23 inventory of what ACET Global had when it closed?
24 A. No.
25 Q. Do you know if anyone ever prepared an

Page 76

1 inventory of what ACET Global had when it closed?
2 A. I do not know.
3 Q. Okay. Who would have done that if they -- if
4 someone did? Who would know how to do that?
5 A. Separate inventory?
6 Q. Yes, ma'am.
7 A. That was too complicated. I do not know.
8 Q. Did the accounting system -- would it have
9 allowed someone to do that?
10 A. You mean separate inventory?
11 Q. Yes, ma'am.
12 A. No. I didn't do it.
13 Q. Who else would have kept track of that?
14 A. Okay. You mean inventories?
15 Q. Yes, ma'am.
16 A. In 2018, I -- I don't think anybody did.
17 Q. Nobody did?
18 What about 2019?
19 A. 2019? I was not sure about 2019; but, in
20 2020, I'm pretty sure our -- Paula did. She was
21 tracking -- she was keep tracking of all the
22 inventories.
23 But I was not sure about 2019; but, in
24 2020, yes, she did.
25 Q. Okay. Anything the else that you remember

Page 77

1 about the -- the change to Windspeed?
2 MR. PERRIN: Objection; form.
3 A. Okay. What change?
4 Q. (BY MR. FREEMAN) The change from ACET Global
5 to Windspeed.
6 A. I feel like we are the same group, and we
7 just moved into a new building and we're doing the
8 same business.
9 Q. Okay. Did -- did you ever have any
10 discussions about a lender called Super G Capital?
11 A. I know Super G.
12 Q. Who -- who do you know at Super G?
13 A. Because I -- I do wire transfer to them.
14 Q. Oh.
15 A. I'm familiar with this name.
16 Q. Do you -- what is Super G? What do you know
17 them to be?
18 A. Actually, I don't know what do they really
19 do; but I know we're doing business with them because
20 we do wire transfer to them every month per Bill's
21 request.
22 He told me, "Okay, do the wire transfer
23 to them."
24 Q. Okay. And do you -- do you know what -- what
25 Super G Capital does?

Page 78	Page 80
<p>1 A. No.</p> <p>2 MR. PERRIN: Objection; form.</p> <p>3 Q. (BY MR. FREEMAN) Okay.</p> <p>4 A. I really don't know.</p> <p>5 Q. Did Windspeed ever buy inventory from Super G</p> <p>6 Capital?</p> <p>7 A. Windspeed?</p> <p>8 Q. Yes, ma'am.</p> <p>9 A. I -- I do not know.</p> <p>10 Q. You don't know if Windspeed ever purchased</p> <p>11 inventory from Super G?</p> <p>12 A. I thought the inventory was really</p> <p>13 complicated because of -- we change from ACET to</p> <p>14 Windspeed, the inventory things were really</p> <p>15 complicated.</p> <p>16 I'm not 100 percent sure, so I just</p> <p>17 don't -- I do not know.</p> <p>18 Q. Since you've been at Windspeed, what's the</p> <p>19 largest payment that you remember Windspeed making to</p> <p>20 Super G Capital?</p> <p>21 A. The largest? A few thousand.</p> <p>22 Q. And what is "a few thousand"?</p> <p>23 A. I -- I do not know the exact number.</p> <p>24 But I remember most is, we wire them</p> <p>25 \$400 each month.</p>	<p>1 payment to any entity that has the name Baymark in it?</p> <p>2 A. Transfer money to Baymark? No.</p> <p>3 Q. Nothing?</p> <p>4 A. I do not remember that.</p> <p>5 Q. Okay.</p> <p>6 MR. FREEMAN: I would like -- Mendy, I'd</p> <p>7 like to put up on the screen an exhibit. We've named</p> <p>8 it 02. I don't know if you want me to -- if you're</p> <p>9 fine with me to do a screen share.</p> <p>10 THE REPORTER: Absolutely.</p> <p>11 (Marked Lin Exhibit No. 2.)</p> <p>12 Q. (BY MR. FREEMAN) Jane, can you see what's on</p> <p>13 the screen?</p> <p>14 A. Yes.</p> <p>15 Q. And what -- what is this?</p> <p>16 A. This is a pick list to Zulily. Mm-hm. Like,</p> <p>17 okay, those items list down there, those are the ones</p> <p>18 we shipped out to them on that day, February 6th,</p> <p>19 2019.</p> <p>20 Q. And you shipped these to who?</p> <p>21 A. To Zulily.</p> <p>22 Q. Okay. And what did you call this? A pick</p> <p>23 list?</p> <p>24 A. Yes.</p> <p>25 Q. What does that mean?</p>
Page 79	Page 81
<p>1 Q. Would the biggest payment be something like</p> <p>2 \$2,000 or \$10,000?</p> <p>3 A. Not 10,000. Not that much, no.</p> <p>4 Q. Never 10,000?</p> <p>5 A. Never. Less than that.</p> <p>6 Q. Okay. \$5,000?</p> <p>7 A. I do not remember but it has to be less,</p> <p>8 probably.</p> <p>9 Q. And had -- has it ever made -- has Windspeed</p> <p>10 ever made a payment over a hundred thousand dollars to</p> <p>11 Windspeed [verbatim]?</p> <p>12 A. How much?</p> <p>13 Q. 100,000.</p> <p>14 A. No. To Super G, no.</p> <p>15 Q. Okay. Has it made a payment that large to</p> <p>16 anyone?</p> <p>17 A. I do not remember, but not to Super G.</p> <p>18 For Super G, no. We normally transfer</p> <p>19 400.</p> <p>20 Q. \$400?</p> <p>21 A. Yes.</p> <p>22 Q. Okay. But you don't know what that's for,</p> <p>23 correct?</p> <p>24 A. No. Bill told me to do that.</p> <p>25 Q. Do you ever make wire payments or any kind of</p>	<p>1 A. Okay. [Audio glitch] -- word from Shira, so</p> <p>2 we call this pick lists.</p> <p>3 It's like their purchasing orders. They</p> <p>4 buy things from us, and we ship those items to them.</p> <p>5 Q. Who is this vendor, Zulily?</p> <p>6 A. One of the our marketplaces. One of --</p> <p>7 Q. I'm sorry?</p> <p>8 A. One of our marketplaces.</p> <p>9 Q. Okay.</p> <p>10 A. One of our customers.</p> <p>11 Q. Was this a -- was this also a customer of</p> <p>12 ACET Global?</p> <p>13 A. I think so, yes.</p> <p>14 Q. Okay. The vendor name, if you can look to</p> <p>15 the left side, can you tell me what name is reflected</p> <p>16 as the vendor name?</p> <p>17 A. Okay. So the vendor name put on there was --</p> <p>18 it says "ACET Venture Partners," but it's our</p> <p>19 Windspeed address.</p> <p>20 Q. Okay.</p> <p>21 A. They made a mistake.</p> <p>22 Q. So the -- the address there, 1761 Inter-</p> <p>23 national Parkway, that's the address of Windspeed?</p> <p>24 A. Yes.</p> <p>25 Q. Okay. And who is that e-mail address listed</p>

Page 82	Page 84
<p>1 there?</p> <p>2 A. Okay. I cannot see. Is that -- or can you</p> <p>3 enlarge? I.</p> <p>4 Did -- I didn't recognize this e-mail.</p> <p>5 I think -- I think Sai -- I think it's Sai's ACET</p> <p>6 Global e-mail.</p> <p>7 Q. Okay. It's -- to just be clear, that's an --</p> <p>8 is that an acetglobal.com e-mail address?</p> <p>9 A. If that's -- that's e-mail -- if the -- it</p> <p>10 says "acetglobal.com," and "Sai." I think it's hers.</p> <p>11 But, actually, I'm -- I'm not 100 percent sure.</p> <p>12 Yes, this looks like Sai's e-mail for</p> <p>13 ACET Global.</p> <p>14 Q. Okay.</p> <p>15 A. They -- they didn't update it. Zulily didn't</p> <p>16 update it.</p> <p>17 Q. Okay.</p> <p>18 A. They only updated the address.</p> <p>19 Q. Okay. And can you tell me what the writing</p> <p>20 is on this?</p> <p>21 A. I think it's Dana's or Paula's handwriting.</p> <p>22 When they -- because they work for --</p> <p>23 for the warehouse, when they ship out the items, they</p> <p>24 make notes like "All Shipped" and the date.</p> <p>25 Q. Okay. And when was this shipped?</p>	<p>1 A. Like -- like, for the Moonlight Lamp,</p> <p>2 Moonlight Lamp, I'm really not too familiar with those</p> <p>3 items' inventory, because we have too many SKUs. I</p> <p>4 just do recording.</p> <p>5 And I'm familiar with those items, but I</p> <p>6 cannot tell you, okay, if that's only for Windspeed or</p> <p>7 ACET.</p> <p>8 Q. Okay.</p> <p>9 A. Uh-huh.</p> <p>10 Q. Okay.</p> <p>11 A. But I'm familiar with those items.</p> <p>12 (Marked Lin Exhibit No. 3.)</p> <p>13 Q. (BY MR. FREEMAN) Jane, I'm putting up what is</p> <p>14 marked as Exhibit 3.</p> <p>15 A. Yes.</p> <p>16 Q. Can -- do you recognize this document?</p> <p>17 A. Yes, the bill from DHL.</p> <p>18 Q. Okay. How often would you receive a bill</p> <p>19 from DHL?</p> <p>20 A. Okay. Let me see.</p> <p>21 Okay. So, actually, I cannot tell you</p> <p>22 if this is from DHL eCommerce or from DHL Express. We</p> <p>23 have two DHLs.</p> <p>24 Q. Okay. Can you tell me who the vendor is</p> <p>25 that's reflected on this?</p>
Page 83	Page 85
<p>1 A. February 6, 2019, you -- it says there.</p> <p>2 Q. Okay. And can you tell me if I'm correct</p> <p>3 that you're referring to what's marked as Exhibit 2?</p> <p>4 Is there an Exhibit 2 sticker on the top of this</p> <p>5 document?</p> <p>6 A. I don't -- I don't know what that "Exhibit 2"</p> <p>7 means, no.</p> <p>8 Q. Can you look on your screen? Does it --</p> <p>9 A. I don't --</p> <p>10 Q. -- show it?</p> <p>11 A. Are you asking me what does this Exhibit 2</p> <p>12 mean?</p> <p>13 Q. I've placed the Exhibit 2 mark on there.</p> <p>14 A. Oh. Okay.</p> <p>15 Q. I just want to make sure we're looking at the</p> <p>16 same document.</p> <p>17 You see that?</p> <p>18 A. Yes.</p> <p>19 Q. Okay. Would you look at the types of</p> <p>20 inventory in -- that are reflected on this pick sheet?</p> <p>21 A. Mm-hm.</p> <p>22 Q. Are those types of inventory that ACET Global</p> <p>23 had?</p> <p>24 A. For the earbuds?</p> <p>25 Q. Yes, ma'am.</p>	<p>1 A. Vendor?</p> <p>2 Q. Yes, ma'am.</p> <p>3 A. Okay. Because, I'm not -- I don't know if</p> <p>4 this -- this is DHL eCommerce or DHL Express.</p> <p>5 Q. Okay.</p> <p>6 A. You have to tell me which one.</p> <p>7 Q. I just --</p> <p>8 A. Let me see. There was account number, but</p> <p>9 I -- I don't recognize by accounting numbers.</p> <p>10 Q. Is that helpful, Jane?</p> <p>11 A. I'm looking.</p> <p>12 Q. Jane, if you can see where I'm pointing at --</p> <p>13 A. Because -- yes.</p> <p>14 Q. -- this may help you.</p> <p>15 A. Oh. eCommerce. Okay.</p> <p>16 So this is -- we use this to ship out to</p> <p>17 our marketplaces. It's not from our vendor.</p> <p>18 Q. Okay.</p> <p>19 A. We use -- yeah. We ship out.</p> <p>20 Q. Okay. So does this reflect your shipping</p> <p>21 costs?</p> <p>22 A. Yes.</p> <p>23 Q. Okay.</p> <p>24 A. Internal ones, yes.</p> <p>25 Q. Okay. And is Windspeed Trading the customer</p>

Page 86

1 here? Is that correct?
2 A. Yes, but the address was wrong.
3 Q. How is that address wrong?
4 A. Okay. There, it was from the old office; but
5 our company name was correct there.
6 Q. So did Windspeed use ACET Global's old
7 office?
8 A. Okay. I'm -- I do not know about this part.
9 Sometimes it just didn't update that.
10 Q. Did Windspeed just take over ACET Global's
11 account?
12 A. Okay. For DHL? I -- I do not remember. I
13 do not remember.
14 Yeah, I'm not sure.
15 Q. Okay. Do you have any idea why it would have
16 the 1501 10th Street address on it?
17 A. No. I don't deal with DHL. I only pay
18 bills. So I didn't create any account or talk to
19 them, no.
20 Q. Who dealt with DHL?
21 A. Who dealt with DHL?
22 Q. Yes, ma'am.
23 A. You mean create account or anything like
24 that?
25 Q. Yeah. Who would be the person that -- that

Page 87

1 knows about this document or dealings with DHL?
2 A. Dana ship out items, and she is dealing with
3 DHL every day because someone is going to come and
4 pick up the items.
5 And I pay for bills.
6 Q. Okay.
7 Okay. I want to ask you about a -- a
8 few other people.
9 Do -- Sai Vattana?
10 A. Mm-hm.
11 Q. Who is Sai Vattana?
12 A. She's doing sales. Sales manager for
13 Windspeed.
14 Q. Okay. When did you first meet Sai?
15 A. March 2018.
16 Q. Okay. And was she an employee of ACET
17 Global?
18 A. Yes.
19 Q. What about Dana Tomerlin?
20 A. I met her at March 2018.
21 Q. Okay. And she was an employee then of ACET
22 Global?
23 A. Yes.
24 Q. What is Dana's role?
25 A. She's doing -- she works in the warehouse at

Page 88

1 that time.
2 You mean at ACET Global?
3 Q. Yes, ma'am.
4 A. Yes, she was working in the warehouse.
5 She was packing -- packing -- yeah.
6 Like that -- print out those, like, labels and pack
7 packages.
8 Q. Was she familiar with the inventory, then?
9 A. At that time?
10 Q. Yes, ma'am.
11 A. I -- I think she was more familiar with
12 those than me because she worked in the warehouse.
13 She knows more items.
14 Q. Did she work at the warehouse for ACET
15 Global?
16 A. Yes.
17 Q. Did she work at the warehouse for Windspeed?
18 A. Yes.
19 Q. Were those the same warehouses?
20 A. No. We had -- we moved to the new office.
21 Q. Okay. Was the warehouse part of the office?
22 A. Yes.
23 Q. So was inventory moved from the old office
24 warehouse the new one?
25 A. I -- I didn't do any moving. I -- I didn't

Page 89

1 pack those inventories, so I -- I do not know.
2 Q. You don't know if anyone else did?
3 A. You mean move -- move all the inventory to
4 the new building?
5 Q. Yes, ma'am.
6 A. We had a moving company.
7 Q. Do you know who packed it up to move it?
8 A. Either the moving company or Dana. I
9 don't -- I do not know.
10 I didn't do it.
11 Q. Okay. Jane, I'm -- I'm putting up on the
12 screen what is marked as Exhibit 6.
13 A. Mm-hm.
14 Q. Do you recognize this document?
15 A. No.
16 Q. No? I'm going to scroll through so that you
17 can see the whole document.
18 A. Okay.
19 MR. PERRIN: I got a question for the
20 court reporter. Exhibit 6 that I've got and received
21 was the affidavit of Monica Plaskett.
22 MR. FREEMAN: Oh. You know what? I'm
23 pulling from Dana's -- let me give you this.
24 MR. PERRIN: All right. Does Dana have
25 different ones? Because, we've not received Dana's

Page 90	Page 92
<p>1 documents yet.</p> <p>2 MR. FREEMAN: They are virtually the</p> <p>3 same but there are some numbering differences.</p> <p>4 Q. (BY MR. FREEMAN) So, Jane, I'm putting on the</p> <p>5 screen now what has marked as Exhibit 8.</p> <p>6 A. Mm-hm.</p> <p>7 (Marked Lin Exhibit No. 8.)</p> <p>8 Q. (BY MR. FREEMAN) Do you recognize this</p> <p>9 document?</p> <p>10 A. No. I do not remember it.</p> <p>11 Q. I'm -- I'm going to scroll through this again</p> <p>12 so that you can see it. Okay.</p> <p>13 Jane, is that your name listed?</p> <p>14 A. Yes.</p> <p>15 Q. And --</p> <p>16 A. Yes.</p> <p>17 Q. Yes. And do you know -- you don't remember</p> <p>18 this document?</p> <p>19 A. Yeah. And I just saw a signature. It looks</p> <p>20 like my signature, but I don't remember this.</p> <p>21 Q. You don't believe you --</p> <p>22 A. That's my signature. Looks like my</p> <p>23 signature, but I just do not remember this</p> <p>24 authorize.com -- dot-net.</p> <p>25 Q. Okay. Do you remember changing any of the</p>	<p>1 A. Yes. That's -- that was the old office,</p> <p>2 mm-hm.</p> <p>3 Q. Okay. And on the "New Account Owner</p> <p>4 Information" at the bottom, does it reflect your name?</p> <p>5 A. Yes.</p> <p>6 Q. And your e-mail -- and your e-mail address?</p> <p>7 A. Yes.</p> <p>8 Q. And is that a Windspeed Trading e-mail</p> <p>9 address?</p> <p>10 A. Yes.</p> <p>11 Q. Okay.</p> <p>12 All right. Here in bold on the</p> <p>13 second -- second page, can you look at that and tell</p> <p>14 me what you understand this document to be doing?</p> <p>15 A. Closing your account.</p> <p>16 What account?</p> <p>17 Q. You're not sure what account this was?</p> <p>18 A. No. I really do not remember.</p> <p>19 Q. Okay. Down in the next box, what was your --</p> <p>20 what was the title you put on this?</p> <p>21 A. "Accounting manager."</p> <p>22 Q. Is that the title that you used?</p> <p>23 A. Yes.</p> <p>24 Q. Okay. And is that your phone number?</p> <p>25 A. Yes.</p>
Page 91	Page 93
<p>1 bank accounts from ACET Global to Windspeed?</p> <p>2 A. Yes.</p> <p>3 Q. And do you remember changing any of the</p> <p>4 vendor payment accounts from ACET Global to Windspeed?</p> <p>5 A. You mean update the -- update our new vendor</p> <p>6 account to our customers or vendors?</p> <p>7 Q. Yes. Updating the bank account with your --</p> <p>8 with ACET Global's old vendors; updating Windspeed's</p> <p>9 bank account?</p> <p>10 A. Mm-hm. I didn't do that, but I know they</p> <p>11 did.</p> <p>12 Q. Okay. And you don't know if you filled this</p> <p>13 document out? Or -- or are you saying you did not?</p> <p>14 A. It looks like I did, but I -- I don't</p> <p>15 remember.</p> <p>16 Q. Okay.</p> <p>17 A. I don't even know what -- what is this for.</p> <p>18 Q. Okay. Let's look at this.</p> <p>19 The "Merchant Information," who does it</p> <p>20 reflect as the company?</p> <p>21 A. It says "Acet Global" there.</p> <p>22 Q. And what is the address?</p> <p>23 A. Yes. That's the old office address.</p> <p>24 Q. Okay. So that is the 1501 address of ACET</p> <p>25 Global; is that correct?</p>	<p>1 Q. Okay. And down below, are you certifying</p> <p>2 that you had authority to make this change?</p> <p>3 A. This sounds a little bit familiar to me now,</p> <p>4 but I -- I still do not remember what this -- what</p> <p>5 this is for.</p> <p>6 But that -- sorry.</p> <p>7 Q. Sorry. I can go up or down, wherever you --</p> <p>8 A. Right.</p> <p>9 Q. -- need me to go.</p> <p>10 A. I really cannot recall authorize.net. I</p> <p>11 don't know what -- what it is.</p> <p>12 Q. Okay.</p> <p>13 A. Sometimes I just -- I just fill out the forms</p> <p>14 per request.</p> <p>15 Q. And who would have requested that?</p> <p>16 A. For this one, I do not remember because I</p> <p>17 don't even know what is this for.</p> <p>18 But most of the times when I fill out</p> <p>19 some documents, I -- I just listen. Bill just give</p> <p>20 me, inform me to do it.</p> <p>21 Q. So Bill Szeto would tell you what to do?</p> <p>22 A. Yes. I always follow him.</p> <p>23 But, for this one, I'm not sure because</p> <p>24 I do not remember anything about this.</p> <p>25 Q. Would you ever have just done this on your</p>

<p style="text-align: right;">Page 94</p> <p>1 own?</p> <p>2 A. If -- if it's filling out forms, yes. I do</p> <p>3 that on my own.</p> <p>4 Q. Or deciding to do this? Would you have made</p> <p>5 that decision?</p> <p>6 A. No. No. I don't -- I don't make decisions</p> <p>7 on anything.</p> <p>8 Q. Would Bill Szeto make that decision?</p> <p>9 A. Normally, yes; but, for this one, I do not</p> <p>10 remember because I don't recognize this.</p> <p>11 Q. Okay. Jane, I want to put up what's marked</p> <p>12 Exhibit 9.</p> <p>13 A. Yes.</p> <p>14 (Marked Lin Exhibit No. 9.)</p> <p>15 Q. (BY MR. FREEMAN) Do you --</p> <p>16 A. Yes.</p> <p>17 Q. -- see that document on your screen?</p> <p>18 A. Yes. I saw that.</p> <p>19 Q. Do you recognize this document?</p> <p>20 A. Okay. I think this is the merchant agreement</p> <p>21 with our customers; but I'm not doing sales, so I'm</p> <p>22 not too familiar with those.</p> <p>23 But it looks like it's merchant</p> <p>24 agreement.</p> <p>25 Q. Okay. Jane, down at the bottom, is --</p>	<p style="text-align: right;">Page 96</p> <p>1 doing that. I didn't know which title to put on</p> <p>2 there, so I just put "Sales."</p> <p>3 I helped them with Restaurant for a</p> <p>4 short period of time.</p> <p>5 Q. Okay. Was that during 2019?</p> <p>6 A. 2019, yes.</p> <p>7 Q. Okay.</p> <p>8 A. We didn't have too much sales on Restaurant.</p> <p>9 It was, you know, so they -- I just offered them to</p> <p>10 help, to help them send -- send out -- e-mail out the</p> <p>11 items.</p> <p>12 Q. Okay. Was this inventory?</p> <p>13 A. Not inventory, like items. Like -- like --</p> <p>14 because, Sai told me, "Okay" -- okay, give me a list</p> <p>15 of items, okay, you can submit to Restaurant, and I</p> <p>16 just fill out the -- the quantity and the pricing and</p> <p>17 I sent to them.</p> <p>18 Q. The items --</p> <p>19 (Speaking simultaneously.)</p> <p>20 A. I just helped them finish the spreadsheet.</p> <p>21 Q. (BY MR. FREEMAN) Okay. The items you're</p> <p>22 referring to, were those inventory?</p> <p>23 A. Sai gave me -- I just -- Sai -- I just -- she</p> <p>24 just gave me suggestions. "Okay, like this item, you</p> <p>25 can send to Restaurant this month."</p>
<p style="text-align: right;">Page 95</p> <p>1 A. Mm-hm.</p> <p>2 Q. -- is that your signature and name?</p> <p>3 A. Yes, because -- because, at that time, I</p> <p>4 tried to help with the sales on Restaurant only</p> <p>5 because we were short.</p> <p>6 You know, everybody was too busy. I</p> <p>7 offered my help for Restaurant for short period of</p> <p>8 time.</p> <p>9 Q. Okay.</p> <p>10 A. Mm-hm.</p> <p>11 Q. And -- and what does that mean, helped with</p> <p>12 Restaurant?</p> <p>13 A. Like, I help them post some -- submit some</p> <p>14 products to Restaurant.</p> <p>15 Q. Okay.</p> <p>16 A. I did it. Only for Restaurant.</p> <p>17 Q. Okay. What title did you use on this</p> <p>18 document?</p> <p>19 A. I think -- I cannot see my signatures. Can</p> <p>20 you -- can you -- can -- okay. Can I see -- I -- I</p> <p>21 cannot see that.</p> <p>22 Q. Do you see --</p> <p>23 A. Oh. Okay.</p> <p>24 Q. -- restaurant.com?</p> <p>25 A. I think -- I got trained at that time for</p>	<p style="text-align: right;">Page 97</p> <p>1 Q. Okay.</p> <p>2 A. I -- mm-hm.</p> <p>3 Q. Jane, how many other titles did you have? Or</p> <p>4 was it just --</p> <p>5 A. Actually, I don't have any titles except</p> <p>6 accounting.</p> <p>7 Q. Okay.</p> <p>8 A. Accounting.</p> <p>9 Q. Was this -- so this reflects a title of</p> <p>10 "Sales"; is that correct?</p> <p>11 A. Right, because I offered my help at that</p> <p>12 time.</p> <p>13 Q. Okay.</p> <p>14 A. Sai was too busy, and I offered my help for</p> <p>15 Restaurant only.</p> <p>16 Q. Okay. Did -- did you ever use any other</p> <p>17 titles, though?</p> <p>18 A. No.</p> <p>19 Q. Okay.</p> <p>20 A. Actually, when I send the e-mails, I -- I</p> <p>21 don't even put a title. I just put my name on there.</p> <p>22 Q. Okay.</p> <p>23 Did you decide to enter into this</p> <p>24 agreement?</p> <p>25 A. I'm sorry?</p>

Page 98	Page 100
<p>1 Q. Did -- did you decide to do this agreement?</p> <p>2 A. Decide? You mean...?</p> <p>3 Q. Let me ask it another way.</p> <p>4 Jane, did -- did someone request you</p> <p>5 to -- to handle --</p> <p>6 A. I got --</p> <p>7 Q. -- this document?</p> <p>8 A. I got this from Restaurant because I send</p> <p>9 them some issues. When they accepted our items, they</p> <p>10 send me the agreement for me to sign.</p> <p>11 Q. Okay.</p> <p>12 A. Just like a mutual agreement.</p> <p>13 Q. Did -- did Bill Szeto ask you to do this or</p> <p>14 did you just do it?</p> <p>15 A. I offered my help.</p> <p>16 Q. To Bill?</p> <p>17 A. Because -- to sales.</p> <p>18 Sai was too busy, and I offered my help.</p> <p>19 Because Monica left, we were -- we -- we just -- we</p> <p>20 just need help; so I offered my help.</p> <p>21 Q. Okay. Who did you offer your help to</p> <p>22 specifically?</p> <p>23 A. Didn't to somebody, just offered my help</p> <p>24 to -- to do sales for Restaurant because Restaurant</p> <p>25 was a very small marketplace, and which I can handle.</p>	<p>1 the too much money left there.</p> <p>2 Q. Okay. You don't know what happened to it,</p> <p>3 though?</p> <p>4 A. I -- I don't think there were too much money</p> <p>5 left.</p> <p>6 Q. Okay. But you don't know what happened to</p> <p>7 it?</p> <p>8 A. With the money, no.</p> <p>9 Q. So this document was to -- was prepared to</p> <p>10 close ACET Global's bank accounts?</p> <p>11 A. Yes.</p> <p>12 Q. And who -- who prepared this document?</p> <p>13 A. Bill signed.</p> <p>14 Q. Did you --</p> <p>15 A. I --</p> <p>16 Q. -- prepare it?</p> <p>17 A. I think I -- I called the bank and I was</p> <p>18 told, "You need to get your boss to sign," and they</p> <p>19 send us some document to -- for closing account.</p> <p>20 Q. (BY MR. FREEMAN) Okay.</p> <p>21 A. So that's why we had a -- this.</p> <p>22 Q. Did they need Windspeed's boss or ACET</p> <p>23 Global's boss?</p> <p>24 A. Oh, they just said my boss.</p> <p>25 Q. Okay.</p>
Page 99	Page 101
<p>1 Q. Okay.</p> <p>2 A. We didn't have a lot of sales on there.</p> <p>3 Q. Jane, I'm putting up on the screen what's</p> <p>4 marked as Exhibit 10.</p> <p>5 A. Mm-hm.</p> <p>6 (Marked Lin Exhibit No. 10.)</p> <p>7 Q. (BY MR. FREEMAN) Can you see this document?</p> <p>8 A. Yes.</p> <p>9 Q. And what is this document?</p> <p>10 A. Okay. I'm familiar with this one because --</p> <p>11 Q. Okay.</p> <p>12 A. -- we sent to our bank to -- to close three</p> <p>13 bank accounts.</p> <p>14 Q. Okay. Whose bank accounts were they?</p> <p>15 A. The -- the three -- all the three accounts</p> <p>16 were under ACET Global.</p> <p>17 Q. Okay.</p> <p>18 A. When I -- when I work for ACET global, we had</p> <p>19 those three bank accounts.</p> <p>20 Q. Were there ever any other bank accounts?</p> <p>21 A. We had our new -- we had our Windspeed new</p> <p>22 bank account after our company was established.</p> <p>23 Q. Okay. What happened to all the money that</p> <p>24 was in the ACET bank accounts?</p> <p>25 A. I didn't -- I -- okay. I think there was not</p>	<p>1 A. Which is William.</p> <p>2 Q. Why was Windspeed closing ACET Global's bank</p> <p>3 account?</p> <p>4 MS. HARD-WILSON: Objection; form.</p> <p>5 A. Bill told me to do it.</p> <p>6 Q. (BY MR. FREEMAN) Okay.</p> <p>7 A. I don't know why he told me to do it, but he</p> <p>8 told me.</p> <p>9 Q. Why did Bill have authority to close ACET</p> <p>10 Global's bank account?</p> <p>11 A. I never talked about this with him.</p> <p>12 MS. HARD-WILSON: Objection; form.</p> <p>13 Q. (BY MR. FREEMAN) Was Bill a signer on the</p> <p>14 bank account?</p> <p>15 A. I do not know. But -- but it -- he -- but</p> <p>16 we -- but we closed this account successfully.</p> <p>17 Q. Now, this is in 2019. I thought that ACET</p> <p>18 Global was closed in 2018.</p> <p>19 A. Right.</p> <p>20 Q. Why did it still have bank accounts open?</p> <p>21 MS. HARD-WILSON: Objection; form.</p> <p>22 A. I -- I really do not know. Because Bill</p> <p>23 didn't close it.</p> <p>24 I just followed his instructions.</p> <p>25 Q. (BY MR. FREEMAN) Bill controlled all of that?</p>

Page 102

1 A. Right. He made decisions.
2 Q. Is it correct, in fact, that ACET Global did
3 still have bank accounts open after September of 2018?
4 A. It looks like, yes, because this -- those
5 accounts were under ACET Global.
6 Q. Okay. Who was paying you to do this work
7 related to ACET Global?
8 A. Paying me?
9 Q. Yes, ma'am.
10 A. I got paid from Windspeed after October.
11 Q. Okay. Did you get a final paycheck from ACET
12 Global?
13 A. Final paycheck?
14 Q. Yes. Or -- or did Windspeed pay you for your
15 old work?
16 MR. PERRIN: Objection; form.
17 A. From when? From when?
18 Q. (BY MR. FREEMAN) From September of 2018.
19 A. I think Windspeed started to pay me from
20 October.
21 Q. So did Windspeed pay you for any of the work
22 you had done while you were employed by ACET Global?
23 A. No. Windspeed was established after ACET was
24 closed.
25 Q. Okay. Jane, now I'm putting up on the screen

Page 103

1 a document that's marked as Exhibit 11.
2 (Marked Lin Exhibit No. 11.)
3 Q. (BY MR. FREEMAN) Do you recognize this
4 document?
5 A. No content, right?
6 Q. I'm sorry -- yes, you're correct.
7 Does this look familiar, this document
8 or type of document?
9 A. It was from Toshiba printer.
10 Q. And what is the Toshiba printer?
11 A. Toshiba printer was the printer in -- in our
12 office.
13 Q. Okay. Did you get a document like this
14 whenever you printed a document on it?
15 A. Print? No.
16 Q. Did you get a --
17 A. Probably scan. I didn't remember, but I
18 never paid attention to this.
19 Q. (BY MR. FREEMAN) Did you get a document like
20 this whenever you did a scan on the Toshiba scanner?
21 A. I do not remember.
22 I saw them scan documents. I don't -- I
23 didn't scan that often.
24 Q. Does this look like you scanned this
25 document?

Page 104

1 A. It looks like somebody else because they send
2 to my e-mail, right? From Toshiba scanner to my
3 e-mail.
4 Okay. Yeah, probably I did. I -- I do
5 not remember. Yeah, it -- it was something scanned
6 and sent to my e-mail.
7 Q. Okay. And what date was this done?
8 A. It says Friday, March 22nd.
9 Q. Okay.
10 A. It says that.
11 Q. 2019?
12 A. Mm-hm. It -- it -- it says on there. Right.
13 Q. Okay. Do you know when y'all got rid of the
14 Toshiba scanner?
15 A. When?
16 Q. Yes, ma'am.
17 A. I do -- I can check, but I do not remember.
18 Q. Okay.
19 A. Long time ago.
20 Q. Is that something you'd be willing to provide
21 us after the deposition that information?
22 A. I do not remember when --
23 MR. PERRIN: Well, we'll discuss that
24 with our client and get back to you Jason.
25 MR. FREEMAN: Okay. Thanks, Tim.

Page 105

1 Q. (BY MR. FREEMAN) Jane, I am -- I am putting
2 up on the screen a document that's marked as
3 Exhibit 12.
4 (Marked Lin Exhibit No. 12.)
5 Q. (BY MR. FREEMAN) Can you see that document?
6 A. Yes.
7 Q. And I -- I will scroll up so you can see the
8 whole thing.
9 Jane, what is this document?
10 A. Can you scroll down?
11 Q. Yes, ma'am.
12 A. Vendor profile and banking change form.
13 Okay. It looks like we updated our bank
14 informations to Zulily.
15 Q. Okay. And why was that being done?
16 MR. PERRIN: Object to the --
17 A. Why? Are you asking me why?
18 Q. (BY MR. FREEMAN) Yes, ma'am.
19 A. Oh. That bank account was under Windspeed.
20 That's -- that's Windspeed bank account. So we're
21 trying to update from ACET bank account to Windspeed
22 bank account.
23 MR. FREEMAN: Tim, did I hear -- did you
24 have something?
25

Page 106

1 MR. WOODS: No. I'm muted.
2 MR. FREEMAN: Sorry.
3 Q. (BY MR. FREEMAN) Jane, so is this -- is this
4 Windspeed transferring over the banking account
5 information that was on file with Zulily to change it
6 from ACET Global's bank account to Windspeed's bank
7 account?
8 A. It didn't say anything about ACET bank
9 account but, yes, this bank account number is the one
10 on the Windspeed. On the --
11 (Speaking simultaneously.)
12 Q. (BY MR. FREEMAN) Okay.
13 A. I recognize it.
14 Q. Okay. And do you believe that's what this
15 was doing?
16 MS. HARD-WILSON: Objection; form.
17 A. It looks like so.
18 Q. (BY MR. FREEMAN) Looks like --
19 A. We are -- we are showing them this is our
20 bank account number.
21 Q. And updating it from ACET Global's bank
22 account?
23 A. It didn't mention anything about ACET Global,
24 so I...
25 Q. So you don't know?

Page 107

1 A. I -- actually, I -- I am not too familiar
2 with this form. I do not remember. But it looks like
3 so.
4 Q. Okay.
5 A. For -- you know.
6 Q. Why did you fill this form out? Were you
7 asked to do that by anyone?
8 A. It has to be, yes.
9 Q. Who would that have been?
10 A. Either Sai or Bill. I don't know.
11 But I was told -- if -- if this is a
12 form I filled out, because there is no my -- no
13 signature, right? There's -- I didn't see any
14 signatures. So I always fill out any documents per
15 request. I don't make decisions.
16 Q. Okay. Jane, I'm putting up on the screen a
17 document that's marked as Exhibit 13.
18 (Marked Lin Exhibit No. 13.)
19 Q. (BY MR. FREEMAN) Can you see that document?
20 A. Yes.
21 Q. Okay. Who's on -- who is this -- what is
22 this document?
23 A. (Reading.)
24 I do not remember if this is something I
25 sent out.

Page 108

1 Q. So is this an e-mail?
2 A. But I do not -- I -- I even don't know what
3 does it mean, ACET's franchise Web file number. I
4 don't even know ACET franchise Web file number.
5 Q. Okay.
6 A. Because, you know, I -- sometimes they -- if
7 they ask me questions for me, I...
8 But, for this one, I do not remember.
9 Q. Okay. Let me ask you.
10 Is this -- is this -- who is this an
11 e-mail from?
12 A. It looks like it's from me.
13 Q. Okay. And is this your Windspeed Trading
14 e-mail address?
15 A. Yes.
16 Q. Okay. And who is this an e-mail to?
17 A. I really don't know who's that, Campbell. I
18 don't remember.
19 Q. Does it say Duncan Campbell?
20 A. Right. I -- I really don't remember this --
21 I don't recognize this name. That's weird. Because,
22 sometimes if that's from me, sometimes I just, you
23 know -- I don't know.
24 I don't recognize this e-mail.
25 Q. That's okay.

Page 109

1 A. When -- when was that?
2 Q. That's a good question, Jane.
3 A. Oh. Let me see. Can you scroll down a
4 little bit?
5 Q. Yeah. I -- I think you can see from the
6 e-mail header here, Jane, if you can see where I'm
7 marking.
8 A. Oh. Let me see.
9 Q. And I think it's --
10 A. It's some --
11 (Speaking simultaneously.)
12 A. Okay.
13 Q. (BY MR. FREEMAN) I think it has
14 Mr. Campbell's --
15 A. Probably the Campbell is -- is -- is -- okay.
16 I can start -- because I -- there was too many people.
17 I -- I don't know who is -- Campbell is but it looks
18 like we're talking about some taxes.
19 Q. (BY MR. FREEMAN) Are those possibly
20 Windspeed's accountants?
21 A. Windspeed -- no. I'm only -- I'm the only
22 one.
23 Q. Are they possibly outside CPAs?
24 A. No. We don't have any --
25 MS. HARD-WILSON: Objection; form.

Page 110

1 A. We don't have any outside CPAs. I'm the only
2 one.
3 Q. (BY MR. FREEMAN) Okay.
4 A. I'm pretty sure.
5 Q. Let me -- let me ask you up on top.
6 Who is -- who is cc'd on this e-mail
7 from you?
8 A. Okay. William Szeto, my boss; Matt is the
9 one from Baymark.
10 Q. Okay. Why is Matt cc'd on this?
11 MS. HARD-WILSON: Objection; form.
12 A. I do not remember. Probably he knows about
13 Campbell. I don't know. I do not remember.
14 And I even didn't recognize Campbell.
15 Who is that?
16 Q. (BY MR. FREEMAN) It -- did you -- did you
17 ever have any correspondence with Matt Denegre?
18 A. Correspondence?
19 MR. PERRIN: Objection; form.
20 A. Okay. What does "correspondence" mean?
21 Q. (BY MR. FREEMAN) Did -- did you ever have any
22 e-mails with Matt Denegre on them?
23 A. I -- yes. I talked to them. I -- I'm pretty
24 sure that I did receive e-mail from him before.
25 Q. And you --

Page 111

1 A. But I don't -- I don't talk to him directly.
2 Like, if we -- if I'm -- if, like --
3 some -- sometimes it's like, okay, I just -- like, for
4 this e-mail, I just don't do not remember, and I just
5 didn't recognize it.
6 Q. Did you ever send e-mails to Matt Denegre
7 relating to tax matters?
8 A. Tax matters?
9 Q. Yes, ma'am.
10 A. This one seems like -- seems to be like that,
11 right? But I just do not recognize it.
12 Q. Whose tax matters are the -- is this e-mail
13 related to?
14 MS. HARD-WILSON: Objection; form.
15 A. It says, Attached is the request list for the
16 ACET Global 2018 taxes. [as read]
17 Okay. It looks like Campbell was the
18 one to help us file ACET Global 2018 taxes -- oh.
19 Okay. Okay. I think so, yes.
20 Q. (BY MR. FREEMAN) Okay.
21 A. Mm-hm.
22 Q. Did -- did Windspeed use Duncan Campbell's
23 accounting firm?
24 A. No.
25 Q. Why not?

Page 112

1 A. Because --
2 MS. HARD-WILSON: Objection; form.
3 A. Because -- because I'm -- I'm doing
4 accounting and I'm taking care of all those taxes for
5 Windspeed.
6 Q. (BY MR. FREEMAN) Okay. Do you file
7 Windspeed's tax returns?
8 A. I think Bill did; but I help with -- I help
9 him for the informations.
10 Q. And does he give you all of the information
11 needed?
12 A. Mm-hm. Yes. He asks me, and I just provided
13 him.
14 Q. And does he tell you every -- every person or
15 entity that has an economic interest in Windspeed?
16 A. No.
17 MS. HARD-WILSON: Objection; form.
18 Q. (BY MR. FREEMAN) Did he ever tell you that
19 Super G Capital had an economic interest in Windspeed?
20 MR. PERRIN: Objection; form.
21 A. No. No.
22 Q. (BY MR. FREEMAN) Did he ever tell you that
23 Windspeed -- that Super G Capital had a warrant for
24 40 percent of Windspeed?
25 A. No.

Page 113

1 MS. HARD-WILSON: Objection; form.
2 Q. (BY MR. FREEMAN) He never referenced that?
3 A. I always do the bookkeeping things, so...
4 Q. Did he ever tell you that an entity with the
5 name Baymark in it had a 40 percent ownership interest
6 in Windspeed Trading?
7 MR. PERRIN: Objection; form.
8 A. No.
9 Q. (BY MR. FREEMAN) Did he ever tell you that an
10 entity with the name Baymark in it had a 40 percent
11 economic interest in Windspeed?
12 A. No.
13 MS. HARD-WILSON: Objection; form.
14 A. No.
15 Q. (BY MR. FREEMAN) Did he ever tell you that
16 the an entity with the name Baymark in it had a
17 warrant for 40 percent of the membership interest in
18 Windspeed?
19 MS. HARD-WILSON: Objection; form.
20 A. No. No. I think -- no.
21 Q. (BY MR. FREEMAN) Did he ever tell you
22 anything related to any of those questions?
23 A. Bill is the owner of the company.
24 MR. PERRIN: Objection; form.
25 Q. (BY MR. FREEMAN) Nobody else?

Page 114

1 A. No.
2 Q. Okay. Would you have wanted to know that if
3 those facts were true and you were preparing
4 Windspeed's tax returns?
5 MR. PERRIN: Objection; form.
6 MS. HARD-WILSON: Objection; form.
7 A. Okay. I don't understand this question.
8 Q. (BY MR. FREEMAN) If other entities had an
9 interest in Windspeed besides Bill Szeto, if you were
10 preparing Windspeed's tax returns, would you want to
11 know that?
12 A. Bill is the --
13 MS. HARD-WILSON: Objection; form.
14 A. Bill is the 100 percent owner of Windspeed.
15 Q. (BY MR. FREEMAN) Is that how Bill reports it
16 on his tax returns?
17 A. I think so. I -- I didn't know anything
18 about Baymark for Windspeed. Bill, he fill -- he --
19 he filed his tax -- Bill filed Windspeed taxes on his
20 own, and I helped him with the numbers.
21 Q. Okay. Did Bill file ACET Global's tax
22 returns on his own?
23 A. I do not know. I do not know.
24 Q. Does Bill have a background in accounting?
25 A. No.

Page 115

1 Q. Does Bill have a background in taxes?
2 A. We -- we had a software.
3 Q. But does Bill have a background in taxes?
4 MR. PERRIN: Objection; form.
5 A. I don't know.
6 Q. (BY MR. FREEMAN) Okay. Did Bill ever provide
7 you with a copy of a Windspeed Trading, LLC operating
8 agreement or company agreement?
9 A. I think we -- I have some documents in my
10 office.
11 Q. Okay. Have you ever read those documents?
12 A. I filed those in my cabinet because that's --
13 that's a lot. I didn't read those.
14 Q. Okay. So you wouldn't know if those stated
15 that Super G Capital had some kind of interest in
16 Windspeed?
17 A. No.
18 Q. And you wouldn't know if a company with the
19 name Baymark in it had some kind of interest in
20 Windspeed?
21 MR. PERRIN: Objection; form.
22 A. No, I -- I don't know. I think -- I only
23 know Bill is my boss, and he's the owner of the
24 company.
25 Q. (BY MR. FREEMAN) That's what he's told you?

Page 116

1 A. Yes.
2 Q. And do you know -- we've talked a little bit
3 about Super G Capital.
4 Do -- do you know Marc Cole with Super G
5 Capital?
6 A. No.
7 Q. While you were working at ACET Global, were
8 you familiar with ACET Global's financial performance?
9 A. I did -- I did do some financial reports
10 every month but I do not remember the numbers now.
11 Q. Okay. Would you look at its revenues?
12 A. I -- I did all the financial reports for
13 them.
14 Q. Okay.
15 A. For the last few months.
16 Q. So would that include revenues and expenses?
17 A. Yes.
18 Q. And assets and liabilities?
19 A. Mm-hm.
20 Q. Did you feel like ACET Global was failing?
21 MR. PERRIN: Objection; form.
22 A. I didn't think about that. But I know --
23 because, right now, I don't remember the numbers;
24 but -- and I -- I never thought of closing things. I
25 never thought of that.

Page 117

1 Q. (BY MR. FREEMAN) You didn't -- it didn't seem
2 like that was -- it was never in your head that that
3 was going to be necessary, it just kind of happened?
4 MR. PERRIN: Objection; form.
5 A. I just did my routine things and finished the
6 numbers and everything.
7 Q. (BY MR. FREEMAN) Okay.
8 Did ACET Global have a liability owed to
9 Super G Capital?
10 A. ACET Global?
11 MS. HARD-WILSON: Objection; form.
12 Q. (BY MR. FREEMAN) Yes, ma'am.
13 MR. PERRIN: Can you repeat the
14 question? I'm sorry. It -- I -- I didn't hear it.
15 It got stepped on.
16 MR. FREEMAN: Yep.
17 Q. (BY MR. FREEMAN) Did ACET Global have a
18 liability to Super G Capital at any time?
19 A. I don't know. I don't know. I really don't
20 know.
21 Q. Do you remember if ACET Global was making any
22 the payments, ever, to Super G Capital?
23 A. I have to check. I do not remember.
24 But, for Windspeed, yes.
25 Q. Okay. But not for ACET Global, that you

Page 118	Page 120
<p>1 remember?</p> <p>2 A. I do not remember, so I -- I do not remember.</p> <p>3 I really do not remember something -- long time ago.</p> <p>4 Q. Do you remember any the discussions with</p> <p>5 anyone about whether to pay Super G Capital?</p> <p>6 A. No.</p> <p>7 For the first few months when I worked</p> <p>8 for ACET, I just focused on getting trained in</p> <p>9 accounting.</p> <p>10 Q. Do you remember anyone talking about</p> <p>11 defaulting, that -- ACET Global defaulting on any</p> <p>12 loans?</p> <p>13 A. No.</p> <p>14 Q. You don't remember them talking about</p> <p>15 defaulting on a loan to Super G Capital?</p> <p>16 A. No.</p> <p>17 Q. Do you remember anyone talking about</p> <p>18 defaulting on a loan to --</p> <p>19 A. No.</p> <p>20 Q. -- to Tomer Damti?</p> <p>21 A. No.</p> <p>22 Q. Jane, I'm -- I'm putting on the screen what's</p> <p>23 marked as Exhibit 14.</p> <p>24 (Marked Lin Exhibit No. 14.)</p> <p>25 Q. (BY MR. FREEMAN) Can you see that document?</p>	<p>1 A. Mm-hm. That's what -- yes.</p> <p>2 Q. Go ahead.</p> <p>3 A. Mm-hm. Yes.</p> <p>4 Q. And why was that prepared?</p> <p>5 A. Why was that prepared?</p> <p>6 Q. Yes, ma'am.</p> <p>7 A. I didn't know. To show the quantities.</p> <p>8 Q. Okay. I'm going to scroll through it for</p> <p>9 you, Jane, so just so you can see it.</p> <p>10 Do you know if this was prepared in</p> <p>11 2019?</p> <p>12 MR. PERRIN: Objection; form.</p> <p>13 A. I'm pretty sure it was not in 2019.</p> <p>14 Q. (BY MR. FREEMAN) Okay.</p> <p>15 A. Because, I didn't prepare this.</p> <p>16 Q. Okay. Okay. Okay.</p> <p>17 And can you read here? Who is this</p> <p>18 letter from?</p> <p>19 A. No. I've never heard of this person.</p> <p>20 Q. It's Marc Cole, for --</p> <p>21 A. No.</p> <p>22 Q. -- Super G Capital?</p> <p>23 A. No.</p> <p>24 Q. Okay. And can you tell me who is cc'd on</p> <p>25 this letter?</p>
Page 119	Page 121
<p>1 A. Yes.</p> <p>2 Q. Okay. Are you familiar with this document?</p> <p>3 Have you seen it --</p> <p>4 A. No. I've never seen this.</p> <p>5 Q. Can you tell me who this document is</p> <p>6 addressed to?</p> <p>7 A. I even didn't recognize this address.</p> <p>8 Q. Does the document say that it's addressed to</p> <p>9 ACET Global, LLC?</p> <p>10 A. But that's not our old office address. I</p> <p>11 don't know what this address was for.</p> <p>12 Q. Whose name is this to the attention of?</p> <p>13 A. David Hook.</p> <p>14 I don't know him.</p> <p>15 Q. Okay. But you're not familiar with this --</p> <p>16 I'm going to scroll through it for you.</p> <p>17 Do any of these items look familiar?</p> <p>18 And I'm showing you what's marked as Exhibit 1 to</p> <p>19 Exhibit 14, and it is Bates-labeled D&T Partners, LLC</p> <p>20 000510.</p> <p>21 Does this document look familiar to you?</p> <p>22 A. This inventory sheet, yes. Shira -- I think</p> <p>23 Shira used to use this manual form to record</p> <p>24 inventory.</p> <p>25 Q. Okay.</p>	<p>1 A. Julie. I've never heard of Julie.</p> <p>2 But, David, I've heard of this name.</p> <p>3 But there are a lot of people called David. So if</p> <p>4 he's a David from Baymark, yes, I've heard of his</p> <p>5 name.</p> <p>6 Q. Okay.</p> <p>7 A. Julie, no.</p> <p>8 Q. Okay. But you never saw this document?</p> <p>9 A. No.</p> <p>10 Q. Okay. Did you know anything about the</p> <p>11 inventory numbers or codes that were used by ACET</p> <p>12 Global?</p> <p>13 A. Inventory codes?</p> <p>14 Q. Yes, ma'am.</p> <p>15 A. What is inventory codes?</p> <p>16 Q. Like any numberings or codes that were</p> <p>17 assigned to inventory.</p> <p>18 Would you know anything about those?</p> <p>19 A. I don't know what is inventory codes.</p> <p>20 Q. Okay. Let me ask you on this. Are -- are</p> <p>21 you familiar with --</p> <p>22 A. Spinner. Fairy, yeah. Mm-hm.</p> <p>23 Q. So -- so we're looking again at Bates</p> <p>24 Page 510. It's Exhibit 1 of Exhibit 14. And</p> <p>25 specifically, the second line lists an inventory item</p>

Page 122	Page 124
<p>1 known as a Tear of a Fairy bracelet?</p> <p>2 A. I'm not -- I'm not too familiar with the</p> <p>3 Fairy Bracelet but I'm familiar with wrist belt.</p> <p>4 Wrist belt.</p> <p>5 Q. Wrist belt?</p> <p>6 A. Wrist belt, yeah.</p> <p>7 Q. Okay.</p> <p>8 A. A-20162. Mm-hm.</p> <p>9 Q. Okay. Is -- is that an inventory item that</p> <p>10 Windspeed uses?</p> <p>11 MR. PERRIN: Objection; form.</p> <p>12 A. I really do not remember. But this one</p> <p>13 sounds familiar to me.</p> <p>14 Q. (BY MR. FREEMAN) Okay.</p> <p>15 A. Too many items.</p> <p>16 Q. Okay. Are you -- are you aware of whether</p> <p>17 Super G Capital acquired the assets of ACET Global?</p> <p>18 MS. HARD-WILSON: Objection; form.</p> <p>19 A. No. I don't talk to Super G directly.</p> <p>20 Q. (BY MR. FREEMAN) Okay. Do you know if -- do</p> <p>21 you know if Super G Capital ever acquired the assets</p> <p>22 of ACET Global or any asset of ACET Global?</p> <p>23 A. I don't know.</p> <p>24 MR. PERRIN: Object; form.</p> <p>25 Q. (BY MR. FREEMAN) Okay.</p>	<p>1 correct?</p> <p>2 A. No.</p> <p>3 Q. Okay. Did you prepare the trial balance for</p> <p>4 ACET Global?</p> <p>5 A. Trial balance? Oh, the financial reports,</p> <p>6 yes.</p> <p>7 Q. You did.</p> <p>8 A. Mm-hm.</p> <p>9 Q. Did anyone help you with that?</p> <p>10 A. No. Just myself.</p> <p>11 Q. Did anyone give you instructions on anything</p> <p>12 to enter?</p> <p>13 A. Yeah. At the beginning, Shira did.</p> <p>14 Q. Okay. Anybody else?</p> <p>15 A. No.</p> <p>16 Q. Okay. Jane, I'm -- I've put up on the screen</p> <p>17 what's marked Exhibit 16.</p> <p>18 (Marked Lin Exhibit No. 16.)</p> <p>19 Q. (BY MR. FREEMAN) Can you see that document?</p> <p>20 A. Yes.</p> <p>21 Q. Do you recognize this document?</p> <p>22 A. No. No.</p> <p>23 Q. Okay. Are you familiar with a loan from</p> <p>24 Super G Capital to Windspeed Trading in the amount</p> <p>25 of --</p>
Page 123	Page 125
<p>1 A. I only got instructions from Bill.</p> <p>2 Q. Okay. At the time that ACET Global was</p> <p>3 closed, do you know how much it owed to Super G</p> <p>4 Capital?</p> <p>5 A. No. No.</p> <p>6 Q. As of September 2018, do you know how much</p> <p>7 ACET Global owed to Super G Capital?</p> <p>8 A. No. I don't even know the relationship</p> <p>9 between the two.</p> <p>10 Q. As of October 2018, do you know how much ACET</p> <p>11 Global owed to Super G Capital?</p> <p>12 A. ACET? No, I don't know.</p> <p>13 Q. As of December 31st, 2018, do you know how</p> <p>14 much ACET Global owed to Super G Capital?</p> <p>15 A. No. No, I don't know. I really don't know.</p> <p>16 Q. Okay. Jane, I'm showing you a document</p> <p>17 that's marked as Exhibit 15.</p> <p>18 (Marked Lin Exhibit No. 15.)</p> <p>19 Q. (BY MR. FREEMAN) Can you see this document?</p> <p>20 A. Yes.</p> <p>21 Q. Okay. Do you recognize this document?</p> <p>22 A. No. I've never seen this.</p> <p>23 Q. Okay. I'm going to scroll through it just to</p> <p>24 make sure.</p> <p>25 This document is not familiar to you,</p>	<p>1 A. This amount? No.</p> <p>2 Q. -- 514,000?</p> <p>3 A. No. No.</p> <p>4 Q. And if you'll see where it's highlighted,</p> <p>5 does it appear that this was entered into effective of</p> <p>6 March 1st, 2019?</p> <p>7 A. I didn't get involved with this.</p> <p>8 Q. Would it be unusual that you would not --</p> <p>9 since you're in charge of accounting, that you would</p> <p>10 not be made aware of -- of a loan of this nature?</p> <p>11 A. A loan, but --</p> <p>12 MS. HARD-WILSON: Objection; form.</p> <p>13 A. I know we're doing business with Super G but</p> <p>14 I didn't know the amount of loan is this amount. I've</p> <p>15 never seen this document.</p> <p>16 Q. (BY MR. FREEMAN) Okay.</p> <p>17 A. But I know we're doing business with Super G.</p> <p>18 Q. Okay. And, Jane, down at the bottom, I've --</p> <p>19 I've highlighted some other items here, these that --</p> <p>20 these items, a, b, c, d and e, on the bottom of Page 1</p> <p>21 of Exhibit 16.</p> <p>22 A. Mm-hm.</p> <p>23 Q. These appear to be payment amounts that are</p> <p>24 called for.</p> <p>25 A. Mm-hm.</p>

Page 126	Page 128
<p>1 Q. Above that, there's a start date for 2 payments. 3 A. Mm-hm. 4 Q. What date does this reflect for the start 5 date of payments? 6 A. Okay. Can you repeat your question again? 7 From which day? 8 Q. Yes, ma'am. 9 So when does this document, Exhibit 16, 10 Page 1, when -- when does it reflect the start dates 11 are for payments? 12 A. Are you asking me the first payment we made 13 to Super G? 14 Q. Or just what this document reflects. 15 MR. PERRIN: Objection; form. 16 A. Okay. For this document, I never read this 17 before; but looks like this is a payment agreement 18 between us and Super G. 19 Q. (BY MR. FREEMAN) Okay. So if you look down 20 there in the bottom box, Jane? 21 A. Mm-hm. 22 Q. Part A says, for the first three monthly 23 payments, \$2,000 per month. 24 A. Mm-hm. 25 Q. Did -- did Windspeed make payments of \$2,000</p>	<p>1 starting on June 30th, 2020, of \$36,000 a month. 2 Do you know what that -- 3 A. No. We -- we didn't make it. 4 Q. What about Part e? It references the final 5 payment, which would have been due on March 20th, 6 2021, of \$111,144.86. 7 Was this payment made? 8 A. No. No. 9 Q. Did anyone ever discuss any of these payments 10 with you? 11 A. No. 12 Q. Okay. 13 A. No. I've never heard of this. 14 Q. Never heard of that? 15 A. No. 16 Q. But you're in charge of doing the wiring to 17 Super G, correct? 18 A. Right. 19 Q. Okay. 20 MR. FREEMAN: Folks, do you want to take 21 a five-minute break? I think we're relatively close. 22 MS. HARD-WILSON: Yes. 23 MR. FREEMAN: Okay. 24 (Break from 12:46 p.m. to 12:57 p.m.) 25 Q. (BY MR. FREEMAN) Jane, I want to thank you</p>
Page 127	Page 129
<p>1 per month to Super G Capital? 2 A. I think we did make payment; I don't remember 3 when, but a few thousand, yes. 4 Q. Okay. 5 A. But after that, we just pay them 400 each 6 month. 7 Q. \$400 each month? 8 A. Yes. Yes. 9 Q. Okay. So like part B here, it says, for the 10 following five monthly payments commencing with the 11 monthly payment due on June 30th, 2019, \$5,000 per 12 month. 13 Do you know if those payments were made 14 by Windspeed to Super G Capital? 15 A. For that five months, no. 16 Q. Part c references -- 17 A. Okay. Can I explain something? 18 Okay. I didn't know you -- I don't 19 remember if we submit one or never made it; but, for 20 five months [verbatim] payment -- 5,000 per month, no. 21 Q. Okay. What about for Part c? It references 22 payments starting on November 30th of 2019, of \$12,000 23 a month. 24 A. No. We didn't make that much. 25 Q. Okay. Part d references monthly payments,</p>	<p>1 for taking your time today for -- for answering the 2 questions. I know this is not fun on your -- your 3 side. It's not particularly fun on my side, either. 4 But I want to thank you for timing the time, 5 appreciate you taking this seriously. 6 MR. FREEMAN: I will -- I will pass the 7 witness now. 8 MS. HARD-WILSON: We'll reserve. 9 MR. PERRIN: We reserve all questions 10 until time of trial. 11 (The deposition concluded at 12:57 p.m.) 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p>

Page 130

1 WITNESS CORRECTIONS AND SIGNATURE
2 Please indicate changes on this sheet of paper,
3 giving the change, page number, line number and reason
4 for the change. Please sign each page of changes.
5 PAGE/LINE CORRECTION REASON FOR CHANGE
6 _____
7 _____
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25 _____

ZHEXIAN "JANE" LIN

Page 131

1 I, ZHEXIAN "JANE" LIN, have read the
2 foregoing deposition and hereby affix my signature
3 that same is true and correct, except as noted on the
4 previous page(s), and that I am signing this before a
5 Notary Public.
6 _____
7 ZHEXIAN "JANE" LIN
8 STATE OF TEXAS *
9 COUNTY OF _____ *
10
11 Before me, _____, on
12 this day personally appeared ZHEXIAN "JANE" LIN, known
13 to me, or proved to me under oath or through
14 _____ (description of identity card or
15 other document), to be the person whose name is
16 subscribed to the foregoing instrument and
17 acknowledged to me that they executed the same for the
18 purposes and consideration therein expressed.
19 Given under my hand and seal of office on
20 this, the _____ day of _____, 2021.
21 _____
22 NOTARY PUBLIC IN AND FOR THE
23 STATE OF TEXAS
24 My Commission Expires: _____
25 JOB NO. 67300

Page 132

1 CAUSE NO. DC-19-09828
2
3 D&T PARTNERS, LLC | IN THE DISTRICT COURT OF
4 (successor in interest |
5 to ACET VENTURE |
6 PARTNERS, LLC), |
7 Plaintiff, |
8
9 V. | DALLAS COUNTY, TEXAS
10
11 ACET GLOBAL, LLC; |
12 BAYMARK ACET HOLDCO, |
13 LLC; BAYMARK ACET |
14 DIRECT INVEST, LLC; |
15 BAYMARK MANAGEMENT, |
16 LLC; BAYMARK PARTNERS; |
17 DAVID HOOK; TONY |
18 LUDLOW; and WINDSPEED |
19 TRADING, LLC, |
20 Defendants. | 116TH JUDICIAL DISTRICT
21
22 REPORTER'S CERTIFICATION
23 REMOTE ORAL AND VIDEOTAPED DEPOSITION OF
24 ZHEXIAN "JANE" LIN
25 MARCH 26, 2021
I, Mendy A. Schneider, a Certified Shorthand
Reporter in and for the State of Texas, hereby certify
to the following:
That the witness, ZHEXIAN "JANE" LIN, was duly
sworn by the officer and that the transcript of the
oral deposition is a true record of the testimony
given by the witness;
That the deposition transcript was submitted on
_____, 2021, to the witness, or to the
attorney for the witness, for examination, signature,

Page 133

1 and return to Worldwide Court Reporters, Inc., by
2 _____, 2021;
3 That the amount of time used by each party at the
4 deposition is as follows:
5 MS. HARD-WILSON - 00:00:00
6 MR. FREEMAN - 02:16:44
7 MR. WOODS - 00:00:00
8 MR. PERRIN - 00:00:00
9 MR. MONTGOMERY - 00:00:00
10 That pursuant to information given to the
11 deposition officer at the time said testimony was
12 taken, the following includes counsel for all parties
13 of record:
14 MR. JASON B. FREEMAN, MR. RYAN C. DEAN, AND
15 MR. MATTHEW L. ROBERTS, Attorneys for Plaintiff.
16 MS. BRENDA HARD-WILSON AND MR. TIM WOODS,
17 Attorney for Defendant WINDSPEED TRADING, LLC.
18 MR. EDWARD P. PERRIN, Jr., Attorney for
19 Defendants ACET GLOBAL, LLC; BAYMARK ACET HOLDCO, LLC;
20 BAYMARK ACET DIRECT INVEST, LLC; BAYMARK MANAGEMENT,
21 LLC; BAYMARK PARTNERS; DAVID HOOK; and TONY LUDLOW.
22
23 I further certify that I am neither counsel for,
24 related to, nor employed by any of the parties or
25 attorneys in the action in which this proceeding was
taken, and further that I am not financially or
otherwise interested in the outcome of the action.
Further certification requirements pursuant to
Rule 203 of TRCP will be certified to after they have

Page 134

1 occurred.

2 Certified to by me this ____ day of _____, 2021.



3
4
5
6 Mendy A. Schneider
Mendy A. Schneider, CSR NO. 7761
7 Expiration Date: 1-31-2023
8
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Page 135

1 FURTHER CERTIFICATION UNDER RULE 203 TRCP

2 The original deposition was ____ was not ____
3 returned to the deposition officer on _____,
4 2021.

5 If returned, the attached Corrections and
6 Signature page contains any changes and the reasons
7 therefor;

8 If returned, the original deposition was delivered
9 to MR. JASON B. FREEMAN, Custodial Attorney;

10 That \$_____ is the deposition officer's charges
11 to the Attorney for Plaintiff, MR. JASON B. FREEMAN,
12 TBA# 24069736, for preparing the original deposition
13 transcript and any copies of exhibits;

14 That the deposition was delivered in accordance
15 with Rule 203.3, and that a copy of this certificate
16 was served on all parties shown herein and filed with
17 the Clerk.

18 Certified to by me this ____ day of _____, 2021.

19
20
21 Mendy A. Schneider
22 Mendy A. Schneider, CSR NO. 7761
23 Expiration Date: 1-31-2023
24
25

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35 (Pages 134 to 135)